

EXHIBIT A

**DECLARATION OF MATTHEW E. SLOAN
JINHUA'S MIL NO. 6**

**REVISED REDACTED VERSION
PURSUANT TO ECF NO. 337 ORDER**



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Northern District of California*

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November 1, 2021

BY E-MAIL

Jack P. DiCanio
Matthew E. Sloan
Emily A. Reitmeier
300 South Grand Ave.
Los Angeles, CA 90071-3144

Dear Jack, Matt, and Emily:

Crim. L.R. 16-1(c)(4) Notice

Pursuant to Criminal Local Rule 16-1(c), the United States hereby provides notice of statements it intends to offer under Fed. R. Evid. 801(d)(2)(E). *See also United States v. Layton*, 855 F.2d 1388, 1399 (9th Cir. 1988) (holding that the “critical inquiry” under Rule 801(d)(2)(E) “is whether the statements were made during the course and in furtherance of [a] common enterprise.”); *id.* at 1398 (“[T]he common enterprise need not have an illegal objective.”); *United States v. AU Optronics Corp.*, 2012 WL 12036080, at *2 (N.D. Cal. Jan. 11, 2012) (evidence that employer participated in a conspiracy is “strong independent evidence” of employees participation). The United States may seek admission pursuant to other rules as well, including, but not limited to, Fed. R. Evid. 801(d)(2)(A)-(D) and 803(6). Furthermore, the United States may argue that it is not offering certain statements included in this notice for the truth of the matter asserted therein.

Exhibit B to this notice includes information that is confidential under the protective order. We have highlighted in yellow the information that is confidential. Information in Exhibit B that is not highlighted yellow is not confidential. Exhibit C includes excerpts from deposition transcripts in the related civil case. Because those depositions transcripts are marked as confidential pursuant to the protective order in the civil case, we have marked Exhibit C as confidential.

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Documents which the United States may seek to admit pursuant to Fed. R. Evid. 801(d)(2)(E) include:

- The LINE Chats between Kenny Wang and JT Ho that discuss, among other items, Project M, use of laptops at UMC, Stephen Chen, and Wang's decision to leave Micron. (e.g., TAIWANHD-02318618 at pp. 381-433; USD-0000513).
- Statements described by witnesses and documented in FBI 302 reports, as described in Exhibit A.
- The two audio recordings provided by David Huang, UMC's former in-house counsel:
 - The recording of an internal interview of UMC employee Joyce Huang conducted by UMC's David Huang, about Joyce Huang's role procuring off-network laptops for use by Project M employees (UMCD-0000001); and
 - The recording of an internal interview of UMC and Jinhua employee Guo Feng Ming conducted by UMC's in-house counsel David Huang, about the whereabouts and destruction of one of the off-network laptops used by Project M employees to access stolen Micron information (UMCD-0000002).
- Documents, including email messages, related to Project M, sent or authored by any director, employee, contractor, consultant, or agent of UMC or Jinhua, including, but not limited to:
 - Stephen Chen
 - JT Ho
 - Kenny Wang
 - LT Rong
 - Neil Lee;
 - Stan Hung
 - P.W. Yen
 - SF Tzou
 - Wei Mingde
 - Feng Ming Kuo
 - Wang Bang Ming
 - Travis Cho
 - Sandy Kuo
 - Bowen Huang
 - H.H. Cho
 - C.S. Chang
 - Joyce Huang
 - Louisa Kao
 - Lawrence Chueh
 - TR Yew
 - Jinhong Lin
 - Louis Hsieh

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- 鄒世芳
- 黃財煜
- 林宏展
- 楊玉如
- 林仁傑
- 王韶韋
- 李修申
- 郭龍恩
- 莊慧伶
- Albert Wu
- Lawrence Chueh
- Wu Junsheng (31539802@qq.com)
- Johnson Wu (wjs@jhicc.cn)
- Peng Wenquan (max@jhicc.cn)
- Cai Fengsha (sha@jhicc.cn)
- Hank Wu
- Nelson Hsu
- Hero Lo
- Tsung-Han TU
- 徐征 (xuzheng@jhicc.cn)
- 郑进福 (zjf@jhicc.cn)
- 杨凯仁 (k.j.yang@jhicc.cn)
- Jeff Yu
- 苏岳峰 syf7268055@jhicc.cn)
- 萧信煌 (simonhsiao@jhicc.cn)
- 周景祥 (ivanchou@jhicc.cn)
- 应宗桦 (trouver@jhicc.cn)
- 林雅迪 (eddylin@jhicc.cn)

Project M includes all documents related to the development and production of Dynamic Random Access Memory (“DRAM”) at UMC and Jinhua, including all manner of technical and business documents.

- Jinhua's Board of Directors' documents, including, but not limited to, meeting minutes, resolutions, agendas, board presentation, emails, and meeting summaries. Such documents include, but are not limited to:
 - Minutes of the first session, third meeting of the Jinhua board of directors (UMCDOJ-00155245);

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- Agenda for the Jinhua board of directors meeting of June 30, 2016 (UMCDOJ-03098808);
- Board of Directors proposal titled “National Ad Hoc Construction Fund Application Status and Fund Acceptance Placement Report” (UMCDOJ-03102609);
- Board of Directors document titled “Itinerary of UMC President HONG Jiacong’s Visit (May 5 – May6)” (UMCDOJ-03102692);
- Board of Directors motion titled “Sino IC Leasing Company’s Cooperative Lease Proposal with JHICC” (UMCDOJ-03102694);
- Board of Directors presentation dated 2016/5/5 (UMCDOJ-03102699);
- Board of Directors Proposal 3-1: Technical Cooperation Agreement between Jinhua and UMC (UMCDOJ-03102726);
- Board of Directors Proposal 3-2: Technology Development (Cooperation) Contract (UMCDOJ-03102738);
- Board of Directors Motion 4-1: Jinhua Operations Management Authorization Form (Construction Period) (UMCDOJ-03102754);
- Board of Directors Proposal 4-2: Financial Reimbursement Temporary Management Measures (UMCDOJ-03102755);
- Board of Directors Motion 4-3: Seal Management Interim Measures (UMCDOJ-03102761);
- Jinhua Third Session of the First Board of Director’s Meeting Summary of Topics (UMCDOJ-03102783);
- Notice for the Third Session of the First Annual JHICC Board of Directors’ Meeting (UMCDOJ-03102786);
- Second Session of the First Annual JHICC’s Board of Directors’ Meeting Minutes (UMCDOJ-03106735);
- Summary of issues and attendance of the second meeting of the first Jinhua Board of Directors (UMCDOJ-03107392); and
- Board of Directors Meeting Minutes where Stephen Chen delegates certain authorities to Albert Wu (UMCDOJ-00120235).

- UMC Board of Director documents related to Jinhua, Project M, and Stephen Chen, including, but not limited to,

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- Minutes of the Twelfth Meeting of the Thirteenth Session of the UMC Board of Directors (UMCDOJ-06920225);
- Minutes of the Third Meeting of the Thirteenth Session of the UMC Board of Directors (Excerpt) (UMCDOJ-06920177); and
- Minutes of the Seventeenth Meeting of the Thirteenth Sessions of the UMC Board of Directors (UMCDOJ-06920269).
- Admissions made by directors, employees, contractors, or agents of UMC or Jinhua during interviews conducted by the Taiwan Ministry of Justice Investigation Bureau (“MJIB”) or prosecutors in Taiwan, as set forth in Exhibit B.
- Admissions made by directors, employees, contractors, or agents of UMC or Jinhua during depositions taken by counsel for Micron Technology Inc. as part of its civil case against UMC and Jinhua, as set forth in Exhibit C.
- Chinese-government documents related to Jinhua, including documents from the state-owned shareholders of Jinhua and its creditors, describing, for example, Jinhua’s financial obligations, ownership and leadership structure, organizational structure, development and production goals, and relationship to national- and local-level industrial plans for the integrated-circuit industry in China. Such documents include, but are not limited to those of the entities listed below:
 - Documents from the Fujian Jinjiang Industrial Development Investment Group Co., Ltd., regarding Jinhua including, but not limited to:
 - “Letter of Request to JHICC on Recalling a Temporary Loan” (UMCDOJ-00111506).
 - Documents from the National Development and Reform Commission and Ministry of Industry and Information Technology regarding Jinhua including, but not limited to:
 - Document regarding funding for integrated circuit projects from the National Development and Reform Commission and Ministry of Industry and Information Technology (UMCDOJ-00117165); and
 - Document regarding funding integrated circuit projects consistent with the 13th Five-Year Plan. (UMCDOJ-00135031).
 - Documents from the state-owned shareholders of Jinhua, including Fujian Electronics & Information Group (“FEIG”) or the Jinjiang Energy Investment Co., Ltd., including, but not limited to:
 - FEIG Notice on Redefining Leadership Responsibilities (UMCDOJ-00118173);

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- Printout of the “group profile” website describing FEIG from the Wayback Machine (USD-0000680); and
- Printout of the of the “Leadership Team” website for FEIG from the Wayback Machine (USD-0000687).
- Documents from the Fujian Provincial Development and Reform Commission, including, but not limited to:
 - “Development and Planning of the Semiconductor Sector in Fujian (Quanzhou) (2016-2025)” (UMCDOJ-00121202).
- Documents from the Municipal People’s Government Office including, but not limited to,
 - “Several Opinions on Accelerating the Cultivation of Jinjiang City’s Entire Integrated Circuit Industry Chain” (UMCDOJ-00311389).
- Documents from the Municipal Government Office of Jinjiang City including, but not limited to:
 - “Notification of the Municipal Government Office of Jinjiang City on the Issuance of the Recognition Standards (Tentative) of Outstanding Talents in Integrated Circuits Industry” (UMCDOJ-00311398); and
 - Jinjiang City document titled “City of Jinjiang’s Preferential Treatment Policy for Talents in Integrated Circuit Procedural Guideline” (UMCDOJ-00311409).
- Documents from the Quanzhou Municipal People’s Government including, but not limited to:
 - “About Fujian Jinhua Integrated Circuit Production Line Project, Minutes of the first meeting of the Joint Council for Advancement of Work” (UMCDOJ-03093552).
- Documents from the China Development Bank including, but not limited to:
 - “China Development Operating Lease Proposal” documenting Project M financial structure with UMC and Jinhua (UMCDOJ-03102698).
- Documents from the State-Owned Assets Supervision and Administration Commission of Fujian Provincial people’ Government including, but not limited to:
 - “General Office of the State Council on the Establishment of State-owned Enterprises Notice on the Opinions on the Accountability System for Investment in Violation of Regulations” (UMCDOJ-05979344).

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- Presentation titled “DRAM Memory Development” by Stephen Chen (UMCDOJ-0010355).
- Presentation titled “M Team” from Weimin Li (UMCDOJ-00173442).
- Documents distributed at the CASPA recruiting fair and the Jinhua video shown at the CASPA recruiting fair:
 - The Jinhua video presented at CASPA recruiting fair in Silicon Valley. (D-0000119); and
 - Documents distributed at the CASPA recruiting fair. (E.g., D-0000053, D-0000054, D-0000057, D-0000093, D-0000094, D-0000098).

Crim. L.R. 16-1(c)(3) Notice

Pursuant to Criminal Local Rule 16-1(c)(3), the United States hereby provides notice of its intent to admit evidence at trial relating to a disciplinary action that Micron Technology Inc. (“Micron”) took against Stephen Chen while he was the executive in charge of Micron Memory Taiwan (“MMT”). The details of that disciplinary action are described in the FBI FD-302 report associated with the interview of Yanbing Wang on April 21, 2021 (USD-0885748). Because evidence about that disciplinary action is inextricably intertwined with the facts of this case as direct evidence of Chen’s motive and intent to commit the crimes with which he is charged and are thus evidence against Jinhua, the United States avers that the evidence does not fall under Rule 404(b). Nonetheless, the United States reserves the right to argue in the alternative that the evidence is admissible under Rule 404(b) as evidence of motive, intent, preparation, plan, knowledge, absence of mistake, and/or lack of accident.

Dated: November 1, 2021

Respectfully,

/s/ Nicholas Hunter

LAURA VARTAIN HORN
NICHOLAS WALSH
Assistant United States Attorneys

NICHOLAS HUNTER
STEPHEN MARZEN
Trial Attorneys, National Security
Division

Exhibit A

Name of Individual Who Made Statement	Date of Statement	FBI 302 Report Where Statement Documented	QUOTE/STATEMENT
Albert Wu	10/23/2016	D-0000049	WU explained that the partnership between the two companies [UMC and Jinhua] allowed UMC to transfer the technology to the operation team at JHICC. According to the partnership agreement, JHICC would be the primary company responsible for chip manufacturing and future chip innovations and design. JHICC would also be responsible for future consultations and designs of future IC chip manufacturing and product design. Since the company's start in early 2016, JHICC had mostly been focused on the design portion of the product development.
Albert Wu	10/23/2016	D-0000049	WU stated that JHICC was located in the Fujian Province of China, which was in the southeast part of China. The Jinjiang International Airport was located within 10 minutes from the company. In addition, the Xiamen International Airport was not a far distance away from the company headquarters.
Albert Wu	10/23/2016	D-0000049	WU explained that the initial production of chips manufactured by these FAB facilities would go into personal computer (PC) server and lower power device technology such as mobile phones. Over time, JHICC aimed to produce these chips for an industrial or automotive application and eventually provide the chips for consumer application.
Albert Wu	10/23/2016	D-0000049	Given the resources that JHICC was receiving, WU stated that JHICC was a huge opportunity investment. According to JHICC's planned milestone and technology roadmap, JHICC would be able to produce the "1x nm" chip by 2020.
Albert Wu	10/23/2016	D-0000049	WU explained that in order to meet those technological goals, JHICC must recruit more employees to its company. In 2016, JHICC had approximately 69 employees. By 2020, JHICC aimed to employ approximately 2,300 employees. While the bulk of the employment opportunities were in R&D and manufacturing, JHICC was also looking to hire information technology (IT), process integration, and sales and marketing development people to assist with the growth of the company. JHICC was specifically looking to hire individuals in the United States with experience in dynamic random access memory (DRAM) process technology, DRAM product design, DRAM device design, DRAM Process, DRAM Equipment, DRAM Process Integration, Testing, as well as sales and marketing experience.
Albert Wu	10/23/2016	D-0000049	WU reiterated that the primary benefits in investing or working with JHICC was the cost and the supporting government policy. WU stated that in the long run, JHICC would be able to cut the cost of producing IC chip technology and therefore it was an excellent long run investment. In addition, due to the Chinese government's support of JHICC and its goal of building up the semiconductor industry in China, JHICC was still a great investment for one's money and career even though the initial developed technology was a couple years old.
Stephen Chen	10/23/2016	D-0000049	CHEN explained that while UMC was a private company, JHICC was funded and sponsored by the Chinese Government. That was the only way JHICC was able to raise over 5 billion US Dollars since February 2016. CHEN also stated that the "25nm" chip was transferred from UMC to JHICC. CHEN explained that JHICC had full confidence in the "25nm" chip even though the technology was two to three years old. JHICC and UMC planned to use this chip as the foundation and basis for developing more mature technology. The fact that JHICC and UMC were confident in the technology behind the "25nm" chip made JHICC a better investment than investing in other Chinese IC chip manufacturing companies such as those that were based in Wuhan. CHEN stated that the Wuhan company did not have the technology so could not compete with JHICC in the long run.
Stephen Chen	10/23/2016	D-0000049	CHEN stated that individuals that were hired by JHICC would initially be hired as R&D personnel or sales and marketing personnel. While both divisions were separate, CHEN was the primary manager for both divisions. If an individual got hired on as an R&D person, they would initially be relocated to Taiwan for four years for training. Afterwards, that individual would be relocate to Jinjiang City. Sales and marketing hires would be initially transferred to Jinjiang.
Stephen Chen		D-0001327	CHEN expressed dissatisfaction with credit for the technology developed by Powerchip going to the Chairman instead of him.
Stephen Chen	10/24/2016	D-0001378	CHEN spoke on behalf of UMC and JHICC and provided an overview of JHICC's planned timeline, its plans to build facilities, target product release, anticipated wafer starts per month at planned new factory, etc. CHEN also presented that UMC had core DRAM technology, which was being transferred to JHICC, and that UMC had this technology at least six months prior to the meeting.
Stephen Chen	10/24/2016	Forthcoming 302 Report for Recent Interview of Brian Trafas	Over two to three years, JHICC intended to spend about 10 billion USD on the project. The first phase of JHICC's 60k wafer start was to begin with DDR4 and the second phase in Q1 2020 with DDR5.
Stephen Chen		Forthcoming 302 Report for Recent Interview of Yanbin Wang	Around the time of his departure from Micron Stephen CHEN told Yanbin Wang that he got the IT Director Steven Chen to make sure nothing was left on his Micron laptop.
Stephen Chen		Forthcoming 302 Report for Recent Interview of Yanbin Wang	Around the date of his departure from Micron, Stephen Chen stated to Yanbin Wang that "my laptop is all cleaned."

Exhibit B

(Contains Information Designated as
Confidential Under the Protective Order)

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT [Translated]
J.T. Ho - Pg 2	2/7/2017	D-0000276_HT-00001	<p>Question: Past experience? Current position?</p> <p>Answer: "I worked at the Etch Engineering Department of Taiwan Semiconductor Manufacturing Company, Limited in 2003, worked at the Production Integration Department at Powerchip Technology Corporation (hereinafter Powerchip) in 2008 and Rexchip Electronics Corporation in the middle of 2008. Rexchip Electronics Corporation is a joint venture by Powerchip Technology Corporation and Japan Elpida Memory, Inc. (was later acquired by Micron Technology, Inc and renamed as Micron Memory Taiwan). While at Rexchip Electronics Corporation, I also work in the Production Integration Department. I was an engineer and then a section manager. After I left in October 2015, I was employed as an assistant to Senior Deputy General Manager CHEN Zhengkun at United Microelectronics Corporation (hereinafter UMC) in November. In January 2016, UMC planned to initiate PROJECT MEMORY (Project Memory, hereinafter PM), and in April, UMC officially established the PM Department, as well as subordinate departments PM1 (photo engineering, etch engineering, thin film, diffusion, and chemical machinery grinding) and PM2 (Integration First Department, Integration Second Department, Component, Defect). Since then, I have been the Manager of Integration First Department of PM2."</p>
J.T. Ho - Pg 2	2/7/2017	D-0000276_HT-00001	<p>While I am the Manager of Integration First Department of PM2, my main responsibility is to compile the programs developed by previously mentioned units in PM1 to optimize state, and produce the DRAM chips product under the optimized state. The cutting, assembly, and testing are not my responsibilities. My direct superiors in order are Director RONG Lelian, Senior Deputy General Manager CHEN Zhengkun, Executive Officer YAN Bowen, Chairman HONG Jiacong; as for subordinates, there are LIN Yujie, LYU Wenjie, FENG Liwei, HUANG Shuhan and other 10ish people.</p>
J.T. Ho - Pg 2	2/7/2017	D-0000276_HT-00001	<p>Question: Do you know WANG Yongming? What is your relationship? Do you have any monetary matters relations?</p> <p>Answer: "I know WANG Yongming, he is my colleague while I was at Powerchip, Rexchip Electronics Corporation, and UMC. We were both Engineers under Integration Department of Powerchip. While we worked at Rexchip Electronics Corporation, I was still an Engineer at Integration Department, WANG Yongming was a Section Manager of Electrical Testing. After I joined UMC in the November, 104th Year, WANG Yongming has asked me about the situation in UMC and expressed the willingness that he wants to be R&D personnel in UMC. Therefore, he left Micron Memory Taiwan to UMC in the end of April, 105th Year. He was then the Section manager of Component Department under PM2. Besides leading a few Engineers, he was also their superior. He later was promoted to Manager of Component Department. We do not have monetary relationship."</p>
J.T. Ho - Pg 3	2/7/2017	D-0000276_HT-00001	<p>Question: Why did the Senior Deputy General Manager CHEN Zhengkun of UMC recruited you from Micron Memory Taiwan in November, 105th Year?</p> <p>Answer: "CHEN Zhengkun was the General Manager at Rexchip Electronics Corporation. After Rexchip Electronics Corporation was acquired Micron Technology, Inc, he became the Chairman and General Manager of Micron Memory Taiwan. Before the acquisition, CHEN Zhengkun was the General Manager with real power, however, after he became the Chairman and General Manager of Micron Memory Taiwan, he lost the leadership on finance, legal, procurement, and personnel. The business at original DRAM Department was taken away by the Micron Technology, Inc expatriate subordinates. This is why CHEN Zhengkun finds Micron Memory Taiwan has no future. He left his post and joined UMC in June, 104th Year. CHEN Zhengkun recognized and respected me while he was in Micron Memory Taiwan, I did express to him that I am willing to follow him when he left Micron Memory Taiwan. This is why he asked me to come to UMC for an interview in September, 104th Year. After I was admitted, I joined UMC in the beginning of November, 104th Year."</p>
J.T. Ho - Pg 3	2/7/2017	D-0000276_HT-00001	<p>Question: Right before personnel from this Office entered PM office, were you notified there are people coming to search?</p> <p>Answer: Yes. One minute before your Office entered the Office, I have heard colleagues in the office saying there are people coming to search our PM office. Not long after that your Office came to search WANG Yongming.</p>
J.T. Ho - Pg 4	2/7/2017	D-0000276_HT-00001	<p>Question: Why would you doubt this Office is going to search you or others in the office?</p> <p>Answer: "It's because our PM department has recruited many people from companies also working on DRAM. Back in January 105th Year, when UMC was initiating Project Memory, CHEN Zhengkun, me, Li Fuzhe from Etch Engineering Department, GUO Fengming from Defect Department talked about the development strategy because we were all from Powerchip to Micron Memory Taiwan and then to UMC. We have similar backgrounds so we have brought up several proposals, one is to use the known Micron Memory Taiwan technology to reproduce UMC products and another is to trace the technology track by Samsung, the leading DRAM factory in the world, by using reverse engineering to figure out the manufacture procedure. At the end, our concern is if we used Micron Memory Taiwan technology to reproduce products, we will definitely be sued by Micron Memory Taiwan and it's not really possible for us to replicate. Our conclusion is we will be using reverse engineering method on Samsung to research and develop our own product. But because if we can follow up on Samsung's track and successfully research and develop our own product, Micron Technology, Inc might close down. Plus, an U.S. HR Manager has warned me when I left Micron Memory Taiwan in October, 104th Year that the company will definitely sue if I ever divulge Micron Memory Taiwan trade secret. In addition, me, Li Fuzhe, and GUO Fengming has received registered mail from Micron Memory Taiwan in April or May of 105th Year warning us that we cannot divulge Micron Memory Taiwan trade secret. That mail has also attached a copy of secrecy agreement we signed when we worked there. That's why I felt Micron Memory Taiwan may have action at any time."</p>
J.T. Ho - Pg 4	2/7/2017	D-0000276_HT-00001	<p>Question: When you, CHEN Zhengkun, Li Fuzhe, and GUO Fengming were discussing about the Memory Project development strategy of the UMC, who was the person that brought up the idea of using the known Micron Memory Taiwan technology to reproduce UMC products?</p> <p>Answer: "It was discussed by everyone, we have mentioned that Winbond Company has recruited a R&D team from Japan Elpida Memory, Inc and copied Micron Technology, Inc. technology. They ended up okay and were not sued. We wondered if we could have done the same. But after brainstorming, we have decided to do it the legit way, which is also why we were recruiting the experienced personnel for PM."</p>

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Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 5	2/7/2017	D-0000276_HT-00001	<p>Question: Through investigation, UMC has signed the technology cooperation agreement with China Jinhua Company on May 13th, 105th Year, and has agreed to accept the assignment to develop DRAM related processing technology. What's the detail on this signing event?</p> <p>Answer: "UMC has the intention to take over the DRAM market in China, that is why the Chairman HONG Jiacong was asking the Ministry of Economic Affairs in 103rd and 104th Year to have the Chinese companies to invest in UMC and UMC would develop the DRAM process technology. If it is developed successfully, the technology can be shared by both sides. And with that technology, besides accepting orders to subcontract, UMC can also establish DRAM factory to manufacture standardized DRAM. As for UMC, there is no need to invest money into it, the China Jinhua Company will invest 300 Million U.S. Dollars to purchase all the R&D machines and provide UMC and will invest additional 200 Million U.S. Dollars to cover the personnel cost for each generation. That is guaranteed profit for UMC and Ministry of Economic Affairs has agreed this cooperation."</p>
J.T. Ho - Pg 5	2/7/2017	D-0000276_HT-00001	<p>Question: What is your English name? What email address do you use?</p> <p>Answer: I prefer people call me JT, which the pronunciation of Jianting in English. I use jt_ho@umc.com, personal email address is jenting_tw@yahoo.com.tw and jenting_tw@gmail.com.</p>
J.T. Ho - Pg 5	2/7/2017	D-0000276_HT-00001	<p>Question: What's your salary, including bonus, when you and WANG Yongming were employed by Micron Memory Taiwan?</p> <p>Answer: My annual salary at Micron Memory Taiwan was between 2.2 million to 2.4 million New Taiwan Dollar. My salary when I first joined UMC in November 104th Year was 1.9 million. In February and March of 105th Year, CHEN Zhengkun felt that it's not easy to recruit others if the salary is lower than Micron Memory Taiwan. So after he vigorously advocated for me, my salary was adjusted to 2.2 million to 2.3 million.</p>
J.T. Ho - Pg 7	2/7/2017	D-0000276_HT-00001	<p>Question: As above mentioned, regarding applying Micron Technology, Inc. DRAM processing technology, since you all have background of working in Micron Memory Taiwan with Micron Memory Taiwan process technology material, is this the reason why UMC was able to enter the DRAM manufacture market is such short period of time?</p> <p>Answer: "If we use Micron Memory Taiwan DRAM process technology material, it will certainly expedite the steps of UMC to enter the DRAM manufacturing market. However, after our discussion, we believed this method will likely bring lawsuit from Micron Memory Taiwan, therefore, we soon gave up on that idea. We then decided to develop DRAM by reverse engineering Samsung technology. Even though reverse engineering may produce patent controversy, but it will likely not being sued by Micron Memory Taiwan for violating Trade Secret Act. In addition, both UMC and Samsung owns their own patents, if there is ever controversy, it is hard to say who will win or lose. It will not be as obvious as getting sued by Micron Memory Taiwan for violating Trade Secret Act."</p>
J.T. Ho - Pg 7	2/7/2017	D-0000276_HT-00001	<p>Question: (Remind: Seized item serial A-6, seized item name: WANG Yongming's cell phone). On March 30th 105th Year, WANG Yongming has messaged you via LINE communication software stating: "you have asked the expert", "non-epi", "0i=19-24ppm", "Impedance, Rs=7+5-11°notchdirection, 45 degree angle", "you need to use that company...", "lots of parameters", "are you running with structure or device shuttle", and you told WANG Yongming that: "it is still STR". What does this conversation mean?</p> <p>Answer: (After review) It was when our PM Department needed to purchase blank wafer through Procurement Department. Due to the fact EPY blank wafer UMC self-produced has beyond average specification, we wanted to purchase cheaper NPC blank wafer. That's why I asked WANG Yongming who has better understanding on this. WANG Yongming then told me some NPC blank wafer parameters for reference, but I told WANG Yongming that we are only doing the basic structure and I do not quite understand this. That's why at the end I told WANG Yongming to handle this after he comes to UMC.</p>
J.T. Ho - Pg 10	2/7/2017	D-0000276_HT-00001	<p>Question: When WANG Yongming discussed his future employment with UMC with CHEN Zhengkun, RONG Letian, or you, have you ever mentioned that UMC will develop DRAM project?</p> <p>Answer: "As far as I know, HONG Jiacong and CHEN Zhengkun at that time have contacted the Fujian Provincial and Xiamen Municipal Government in regard of cooperating on DRAM development. But Xiamen Municipal Government withdrew from the cooperation later on, thus, UMC has only confirmed on cooperating with Fujian Provincial Government in March, 105th Year. At the same time, Jinhua Company was established based on the guidance from Fujian Provincial Government. UMC then signed the contract with Jinhua Company. Also, WANG Yongming decided to change employer because WANG Yongming has learned the DRAM cooperation project between UMC, China, and Jinhua Company."</p>
J.T. Ho - Pg 11	2/7/2017	D-0000276_HT-00001	<p>Question: Do you still have Micron Memory Taiwan materials stored at your private residence?</p> <p>Answer: "Yes. I have used portable hard drive to copy work related files home from office over the time while I was employed by Micron Memory Taiwan. It is still stored in my house in Taichung, those files have not been deleted yet."</p>
J.T. Ho - Pg 11	2/7/2017	D-0000276_HT-00001	<p>Question: Do you also have Micron Memory Taiwan materials stored at UMC dormitory or inside UMC office?</p> <p>Answer: "After my cautious recall, the previously mentioned portable hard drive contains Micron Memory Taiwan work related files is not in my residence in Taichung. It is placed in the UMC dormitory located at No. 6 Dashun 6th Road, Xinshi District, Tainan. As for UMC office, there are no relevant files."</p>
J.T. Ho - Pg 2	2/8/2017	D-0000290_HT-00001	<p>Question: What is your position at United Microelectronics Corporation?</p> <p>Answer: Assistant Manager at First Integration Department of PM2.</p> <p>Question: When is the time of your employment at United Microelectronics Corporation?</p> <p>Answer: I started my position since November 5, 2015.</p> <p>Question: What was your position at Micron Memory Taiwan before you began working at United Microelectronics Corporation?</p> <p>Answer: I was an e5 Engineer, which means the 5th Rank Engineer.</p> <p>Question: Are WANG Yongming and HUANG Shuhan colleagues who share the same office space with you at PM2 of United Microelectronics Corporation?</p> <p>Answer: Yes.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 2	2/8/2017	D-0000290_HT-00001	<p>Question: WANG Yongming left Micron Memory Taiwan in April 2016 and joined United Microelectronics Corporation. Who recruited WANG Yongming to United Microelectronics Corporation?</p> <p>Answer: He and I have been good friends. We were colleagues and we respect each other. After I came to United Microelectronics Corporation, WANG Yongming kept in contact with me. After United Microelectronics Corporation started the DRAM memory project in the beginning of 2016, it started off with a discussion. After discussion, WANG Yongming became interested. I did logical processing at United Microelectronics Corporation in the past and WANG Yongming wasn't too interested, but later on WANG Yongming became interested when he learned of our DRAM memory project. He then professed his willingness to me and I asked him to submit his resume to the company, I think WANG Yongming submitted his resume to United Microelectronics Corporation in February 2016. There are several ways to submit resume, it can go through the website or leave information on the company's webpage. After he informed me that he has submitted his resume, I then informed my manager, RONG Letian, and RONG Letian's superior, CHEN Zhengkun. Later on the person in charge of HR Department asked WANG Yongming to interview.</p>
J.T. Ho - Pg 3	2/8/2017	D-0000290_HT-00001	<p>Question: What's RONG Letian's title?</p> <p>Answer: Director, which is the Director of the PM2 Office. He is the highest manager of PM2. We have PM1 and PM2 in Southern Taiwan Science Park. There was a PM3 for a period of time, RONG Letian is the person in charge of PM2.</p>
J.T. Ho - Pg 3	2/8/2017	D-0000290_HT-00001	<p>Question: What's CHEN Zhengkun's title?</p> <p>Answer: "CHEN manages many things, including procurement management and products. There are even VPs who report to him. He manages many things. I am sure our unit is under CHEN Zhengkun's management. There is also a factory Director, HONG Xidong at Southern Taiwan Science Park. HONG Xidong is considered to be on the same level as CHEN Zhengkun. Both of them need to report to the CEO."</p>
J.T. Ho - Pg 4	2/8/2017	D-0000290_HT-00001	<p>Question: When you were interrogated by the Investigation Bureau, you mentioned that you, CHEN Zhengkun, LI Fuzhe, and GUO Fengming discussed United Microelectronics Corporation's memory development strategy, did the discussion occur in 2016?</p> <p>Answer: "I want to make a correction. GUO Fengming joined the company in February 2016. It was me, CHEN Zhengkun, and LI Fuzhe causally talking about how it should be done and discussed several ideas. One of the ideas is whether we should do the way we know the best, another idea is to copy the technology from Micron Memory Taiwan. It was one plan. One is for us to do it properly without using their technology. It is because Micron Memory Taiwan is ranked 3rd, and we do not have enough manpower if we were to use the same technology as Micron Memory Taiwan. But if we do it ourselves, there will be no legal issue on divulging secrets. And there is also the issue of patents that the company must resolve."</p>
J.T. Ho - Pg 5	2/8/2017	D-0000290_HT-00001	<p>Question: When you were interrogated by the Investigation Bureau, you mentioned that WANG Yongming decided to change job after he learned of the DRAM cooperation project between United Microelectronics Corporation, the Chinese government, and Jinhua Company?</p> <p>Answer: "China wants to manufacture this chip, the Central Government of PRC is giving this special permission to Tsinghua Unigroup to operate, but the expiration date is February 1, 2016. It may have been sometime in early February, I remember it was February. If Tsinghua Unigroup's acquisition went through, the company's strategy was to use mergers or technology transference. If they can acquire Micron Technology, Inc. or become a stockholder of SK Hynix Semiconductor Inc., then they would call it a success. But if there is no clear result by February 1, the company would lose the special permission. Later on, each district would seek investment and each district would propose many proposals. The central government would then review and decide who gets to do it. As far as I know, Tsinghua Unigroup had a joint venture with Wuhan Xinxing to create Changjiang Memory."</p>
J.T. Ho - Pg 6	2/8/2017	D-0000290_HT-00001	<p>Q: While you were at the Investigation Bureau, you mentioned that you kept a portable hard drive in your United Microelectronics Corporation dormitory. Is there Micron Memory Taiwan material in it?</p> <p>A: "Yes. That's for convenience. I also have my personal private data in it. I didn't delete those on purpose."</p>
J.T. Ho - Pg 21	2/14/2017	D-0000200_HT-00001	<p>Q: Do you have anything to add to the transcript produced at this office on February 7, 2017?</p> <p>"Yes. In the last transcript, I didn't inform your Division that I duplicated and took work related materials – both hardcopies and electronic files on a USB drive – from my former employer, Micron Memory Taiwan (MMT), to the PM2 office at UMC, so as to be able to read and reference them at work. Also, on that same afternoon, approximately 15 minutes prior to your Division's arrival at the PM2 office to conduct the search, PM2's person in charge, Assistant Manager RONG Letian, did come over to tell me that the Prosecutor is coming. If there were any personal materials present, I should hurry up and put them away. After hearing this and just as I was taking out the previously mentioned USB drive that contains the MMT electronic files (which also include materials from Revchip Electronics and Powerchip Technology), WANG Yongming, who was also told by RONG Letian, was handing his personal materials over to HUANG Shuhua. HUANG sat on the right-hand side behind WANG. I, too, gave HUANG my USB drive and paper copies and asked her to store them elsewhere. Not long after I gave [them] to her Division personnel entered to conduct the search. HUANG put some of the materials given to her in her cabinet, but took some away from the PM2 office. What was removed included WANG's cell phone, which was on her person, when she was requested by your Division to return to the office."</p>
J.T. Ho - Pg 22	2/14/2017	D-0000200_HT-00001	<p>Q: You said earlier that RONG Letian came to where you sat, told you that the Prosecutor is coming to conduct a search, and to hurry up and put away any personal materials. What was meant by personal materials that needed to be put away?</p> <p>"I knew what RONG Letian meant. He was referring to materials brought to UMC from MMT, where I previously worked."</p>
J.T. Ho - Pg 22	2/14/2017	D-0000200_HT-00001	<p>Q: How did RONG Letian let WANG Yongming know that the Prosecutor and this Division's personnel were coming to conduct a search?</p> <p>A: I don't know. After I took out the previously mentioned USB drive and paper copies, I either saw WANG take similar items to HUANG, or I might have asked WANG how he was going to put away things. That was how I knew WANG was also notified by RONG.</p>
J.T. Ho - Pg 22	2/14/2017	D-0000200_HT-00001	<p>Q: When interviewed by the Prosecutor on February 8, 2017, WANG Yongming stated, "...RONG Letian spoke to us about this matter during yesterday's search by the government investigators. He told HE Jianting and me to remove MMT-related items...my understanding was that he must also have some MMT materials...called me into his office to tell me...my impression was both at the same time..." Is this an accurate depiction of what took place at the time?</p> <p>A: What WANG said differs from my recollection. RONG Letian did in fact tell me that the Prosecutor is coming for a search, but he did not tell me explicitly to remove MMT materials. It is my understanding that RONG meant the MMT materials were included. WANG certainly was aware that I brought work materials from MMT over to UMC. RONG did call me to come into his office, but I declined since I was busy. He then told me that the Prosecutor was on his way to conduct a search. As far as how RONG notified WANG, I didn't see any of it. RONG didn't speak to us at the same time.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 22	2/14/2017	D-0000200_HT-00001	<p>Q: Why does WANG Yongming know that you brought MMT materials to UMC?</p> <p>A: I've mentioned it during chats with WANG. I've also requested CHEN Zhengkun (also known by the English name Stephen) to provide me with a company computer that has USB read permissions, so that I could access personal materials at the office. There were times when WANG would borrow this computer. I have, therefore, chatted with WANG about my bringing over MMT materials.</p>
J.T. Ho - Pg 22	2/14/2017	D-0000200_HT-00001	<p>Q: Has WANG Yongming also used this company computer to access related files a materials he took from MMT?</p> <p>A: I know that WANG also took related MMT work materials. When he has borrowed this company computer, it would be to access his personal materials. Since the office computers restrict USB read access, personal materials could only be accessed on this type of company computer, which has been approved for no USB restrictions. As for whether WANG did use this particular company computer to access files and materials he took from MMT, I have no knowledge.</p>
J.T. Ho - Pg 23	2/14/2017	D-0000200_HT-00001	<p>Q: As for the previously mentioned paper documents and USB drive(s) that were given to HUANG Shuhan by you and WANG Yongming prior to the search conducted by this Division on February 7, 2017, where are they now?</p> <p>A: After being questioned by the Prosecutor on February 8, 2017, I returned to the office sometime between 5:00 p.m. and 6:00 p.m. The company's legal department personnel said at the time that the items WANG and I gave to HUANG for safekeeping must be handed over to the Prosecutor. Therefore, these items should all be with the Prosecutor at this time.</p>
J.T. Ho - Pg 23	2/14/2017	D-0000200_HT-00001	<p>Q: (Note: The catalogued list and properties in the custody of the Taiwan Taichung District Prosecutors Office) Items noted are the previously mentioned objects that you and WANG Yongming gave to HUANG Shuhan. Prosecutors Office personnel rendered a catalog of the seized properties after they were turned over to the Prosecutor on February 9, 2017. Please examine the contents and identify the items that were in your and WANG's possession?</p> <p>A: (After an examination) One notebook computer marked as Article One; the smaller black-colored USB drive in the plastic bag marked as Article Two; of the paper materials marked as Article Three, a total of 13 notebooks labeled two to eight and ten to fifteen; and the Elpida-Rexchip Houli R&D Center Business Plan marked as Article Five. These are the items I gave to HUANG Shuhan at the time. As for the other items, they should all belong to WANG.</p>
J.T. Ho - Pg 23	2/14/2017	D-0000200_HT-00001	<p>Q: Are there any MMT materials duplicated by you and WANG Yongming stored in the previously cited notebook computer?</p> <p>A: I have always used this company computer to access MMT work materials that I duplicated and brought over, which are stored in the smaller black-colored USB drive previously cited as Article Two. Sometimes I would compile directly on the USB. Other times I would save directly onto this company computer. However, after a period of time, I would re-save valuable files back onto the USB drive and delete ones that have little value. Presently, on this company computer, there shouldn't be any MMT files or materials under my user account. These files and materials are all saved on the previously cited USB. When WANG would borrow this company computer, he always used my user 024 UNCLASSIFIED 24 UNCLASSIFIED account and password to log in. I have observed non-UMC files and materials that other(s) stored under my account. Since WANG was the only one who would use my user account and password, when I saw those kinds of materials, I would delete everything in one fell swoop.</p>
J.T. Ho - Pg 24	2/14/2017	D-0000200_HT-00001	<p>Q: Why would Li Fuzhe also have a user account for this notebook computer? How was it being used?</p> <p>A: Li Fuzhe and I started at UMC around the same time. Approximately in the beginning of 2016 when we were discussing UMC's memory project, we needed to access some personal materials and so together we requested a company computer that had USB permissions from CHEN Zhengkun. This is why this company computer has both my and Li's user accounts. I have asked Li how he would use this notebook computer. Li told me that he would use it to access reports previously written by him for reference purposes.</p>
J.T. Ho - Pg 24	2/14/2017	D-0000200_HT-00001	<p>Q: (Note: Property seized on February 7, 2017 marked as A-6; Item Description: WANG Yongming's cell phone; one captured Line chat with JT, [or] HE Jianting) In the noted item, on June 30, 2016, WANG Yongming asked you, "Where is Fuzhe's company computer? Could I borrow it to look at documents?" Your response, "Fuzhe's was taken by Stephen...mine is in the gap on top of my small cabinet...Passwor Qwer1234..." WANG Yongming replied, "Thank you...I'll be careful with it." What is the meaning of this conversation?</p> <p>A: (After an examination) Li Fuzhe and I started by each requesting a company computer from CHEN Zhengkun. This chat was from the time when WANG Yongming asked me the whereabouts of the company computer assigned to Li. WANG wanted to use it to access his personal USB files and materials. Since CHEN Zhengkun, aka Stephen, had taken Li's company computer, I told WANG to use the computer assigned to me password at the time was Qwer1234, but it was changed at regular intervals. It was against policy to access personal materials at UMC. This was why at the end WANG made a point to express that he'd exercise caution when operating the computer.</p>
J.T. Ho - Pg 24	2/14/2017	D-0000200_HT-00001	<p>Q: Could you elaborate on the process of how you and Li Fuzhe requested and were granted company computers that could be used to access personal materials?</p> <p>A: After giving his consent, CHEN Zhengkun instructed his assistant Luisa (I can't recall her full name) at the Xinzhu office to process our request. Later UMC's IT staff set up two company computers and issued them to Li and me.</p>
J.T. Ho - Pg 25	2/14/2017	D-0000200_HT-00001	<p>Q: Even though your using the company computers was with CHEN Zhengkun's consent and the computers were set up and given to you by UMC's IT staff, yet you indicated, "It was against policy to access personal materials at UMC. This was why at the end WANG [Yongming] made a point to express that he'd exercise caution when operating the computer." Was the reason why WANG Yongming said he'd exercise caution when operating the computer because he was accessing files duplicated and taken from MMT?</p> <p>A: The company computers were intended for us to access files and materials on USBs. There were no policy compliance issues there. Accessing files duplicated and taken from MMT had to be why WANG said that he'd exercise caution when operating the computer. I never inquired what he was doing on the computer when he asked to borrow it.</p>
J.T. Ho - Pg 25	2/14/2017	D-0000200_HT-00001	<p>Q: Was CHEN Zhengkun aware that you and WANG Yongming would use the company computer to access files and materials duplicated and taken from MMT? Or did you intend to access the files and materials duplicated and taken from MMT even when you submitted your request to CHEN Zhengkun to be issued a company computer?</p> <p>A: "...The USB drive seized and held in the Prosecutor's custody was group purchased by other colleagues and me while I worked at MMT..."</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT [Translated]
J.T. Ho - Pg 25	2/14/2017	D-0000200_HT-00001	<p>Q: Prior to the search conducted by this Division on February 7, 2017, RONG Letian instructed you and WANG Yongming to put away so-called personal materials. Then LI Fuzhe returned the company computer issued to him after the search was conducted. Did these things take place because either these personal materials or the files stored in the company computer contained evidence of breached MMT trade secrets?</p> <p>A: RONG Letian probably assumed that those of us who came from other companies to join UMC's memory project would to some extent bring materials from our former employers. As for the company computer assigned to LI Fuzhe, I have no way to know whether it stored MMT materials.</p>
J.T. Ho - Pg 26	2/14/2017	D-0000200_HT-00001	<p>Q: Please examine the materials previously cited as Article Number Three, hardcopies of documents labeled two to eight and ten to fifteen that total 13 notebooks. Explain what is contained in each item. Are they MMT trade secrets?</p> <p>A: The items labeled four, five, and seven are materials on Powerchip Technology's manufacturing process from when I worked there. Since it was on the certified optimal manufacturing process, it should be considered Powerchip Technology's trade secrets. The items labeled three, six, and twelve are materials on Rexchip Electronics's manufacturing process from when I worked there, which should also be considered Rexchip Electronics's trade secrets. The items labeled eleven and fourteen are materials on Rexchip Electronics's high-volume production process from when I worked there. During that period, Rexchip Electronics entered into a merger with Micron Technology and was renamed MMT, and so these materials later became MMT properties and should be considered MMT's trade secrets. The papers labeled two are new hire training materials that I created. Their contents are the ABCs of integrating production processes that incorporate all previously cited materials on manufacturing, that is to say the fundamentals on the subject with additional narratives such as my own views and learnings. They operate much like my personal notes. I don't know whether they would be considered trade secrets. Label thirteen is the Introduction to an Integrated Manufacturing Process created by YU Bin yuan [0151/1755/3293], Technology Team Lead of Rexchip Electronics's Manufacturing Integration Department. I received this set of materials during a training and kept them when the training concluded. YU should now be a Department Manager at MMT. The information is relatively basic and I don't know whether it is considered trade secrets. The item labeled ten is the classification codes for Rexchip Electronics's DRAM wafer testing. I don't know if it falls under trade secrets. Item fifteen is a hodgepodge of materials I retained from when I was at Powerchip Technology. They are most likely not trade secrets. Three sets of materials are under label eight. The first is Elpida Memory's product description (Data Sheet) that I downloaded from the internet, which is not a trade secret. Handouts from when I worked at MMT and attended meeting(s) on the 1x nano DRAM manufacturing process make up the second set of materials. The third item is a brief on MMT's present yield rate for its 20-nanometer class DRAM. I cannot be sure if either or both sets of materials are considered trade secrets.</p>
J.T. Ho - Pg 28	2/14/2017	D-0000200_HT-00001	<p>Q: When interviewed by the Prosecutor on February 13, 2017, after examining the smaller black-colored USB drive numbered Article Two, CHEN Yiling offered, "...also, in the Job Data file folder found in the smaller USB drive branded Kingstone [sic] on the outside are contents identical to the file that I first saw in the mobile hard drive that HE Jianting freely volunteered...HE's separation was October 2015, but the directory shows a MMT file access time of January 2016. HE had already left MMT by that time, so it's proof that he looked at these files. These files and the UMC step naming files he was to create were placed in the same directory folder. I believe he referenced MMT files when he was working on similar processes at UMC. When he was deciding how the manufacturing process should run, he might have referenced the manufacturing process now found at MMT." This is clear indication that after you separated from MMT, you took the company's files and used them at UMC. What is your explanation of these events?</p> <p>A: Files that I've used in each successive job throughout the years have all been saved under the Job Data file folder on the USB drive. I returned to UMC employee housing accompanied by personnel from this Division on February 8, 2017 and consented to handing over the mobile hard drive to their custody. The files within it are more or less the same as what is in the Job Data folder on the USB drive. While I worked at UMC I did access MMT files and materials, but only did so for my personal learning, to broaden my knowledge base, and to make improved work-related judgement calls."</p>
J.T. Ho - Pg 28	2/14/2017	D-0000200_HT-00001	<p>Q: When interviewed by the Prosecutor on February 13, 2017, CHEN Xixian offered, "While inspecting seized evidence today, I came across materials on 1x nano, currently the most advanced manufacturing process at MMT. In theory, HE Jianting should not have had any contact [with it]." Also, according to CHEN Yiling's account, "HE Jianting participated in the 1x nano project. He was the manufacturing integration supervisor. The file(s) I inspected today must have been taken by HE Jianting upon separation from the company. By that time, MMT had already designed the earliest 1x nano manufacturing process." This indicates that label eight's second item was from when you worked at MMT and participated in 1x nano DRAM production meetings. The meeting materials contained extremely advanced MMT trade secrets. Why did you take them upon separation from the company and go so far as to use them as reference when at UMC?</p> <p>A: When I left my job at MMT, MMT was still developing the 1x nano manufacturing process. Its yield rate was zero at that time. I took materials that I might later use for reference out of habit. Label eight's second item, the 1x nano DRAM production meeting materials, was only a relatively basic introduction. I cannot be certain if it could be considered trade secrets. Stored in my black USB flash drive and mobile hard drive – both items have been seized and are in the custody of the Prosecutor and this Division – are materials containing more in-depth information on the 1x nano manufacturing process. I acknowledge that these materials are MMT trade secrets.</p>
J.T. Ho - Pg 28	2/14/2017	D-0000200_HT-00001	<p>Q: (Note: Property seized on February 14, 2017 numbered 28-2; Property: one MMT document) The noted item is a letter dated April 19, 2016, numbered 105-Micron Technology-0040, and addressed to HE Jianting. What are its contents and why was it sent?</p> <p>A: (After an examination) This letter is a reminder from MMT that the company and I signed an employment contract and a non-disclosure and intellectual property agreement on February 14, 2014. Upon separation I must faithfully abide by the provisions that prohibit employee poaching and the violation of confidentiality. One copy each of the two signed contracts are enclosed as attachments. I am not certain if this is standard MMT procedure.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 30	2/14/2017	D-0000200_HT-00001	<p>Q: (Note: Property seized on February 14, 2017 numbered 2B-3; Property: One employment contract) The noted item is a signed contract of employment between Fujian Province Jinhuia Integrated Circuit Company (JHICC) and you. What are its contents and why was it signed?</p> <p>A: (After an examination) I signed this contract in either October or November 2016. The terms were that JHICC was to provide me a project bonus, effective July 1, 2016, to June 30, 2021. The money would come to approximately NTD 1.5 million per annum (same below) after taxes for a total of five years. JHICC would remit money monthly into my Xiamen Bank account. The reason behind signing this contract was because CHEN Zhengkun wanted to attract external hires with a better compensation package, to recruit people from other DRAM companies to work on UMC's memory project. And so CHEN was able to secure this development bonus from JHICC. Then he designated a few employees who he believed to be superior performers and deserve the incentive. My understanding was that, along with myself, LI Fuzhe and GUO Fengming opened accounts at Xiamen Bank after signing the contract with JHICC in order to draw the bonus money. Our entering into a contract with JHICC signified that we would be precluded from receiving bonuses, quarterly awards, and an additional signing bonus from UMC. I was aware of how much on average employees at the Team Lead level would receive in terms of bonuses, quarterly awards, as well as an additional sign bonus.</p>
J.T. Ho - Pg 31	2/14/2017	D-0000200_HT-00001	<p>Q: In the transcript from February 7, 2017, you stated, "...in November 2015 my initial annual salary was approximately [NTD] 1.9 million as a new UMC employee. CHEN Zhengkun believed that a salary like mine, lower than what it was at MMT, made it more difficult to recruit new employees. During February or March 2016, after he took the initiative and fought on my behalf, my annual salary was revised to approximately [NTD] 2.2 to 2.3 million..." If the [NTD] 1.5 million JHICC project bonus that you started receiving beginning July 1, 2016, was added, how much would your salary be?</p> <p>A: The salary amount I spoke of last time included my initial signing bonus. If you go by what it was from July 1, 2016 forward, my annual salary was approximately [NTD] 1.9 million because I was no longer eligible to receive bonuses, quarterly awards, and the additional signing bonus. With the [NTD] 1.5 million in JHICC project bonuses added, my annual salary came to approximately [NTD] 3.4 million.</p>
J.T. Ho - Pg 31	2/14/2017	D-0000200_HT-00001	<p>Q: In view of the aforementioned, your annual salary at MMT was approximately [NTD] 2.2 to 2.4 million. After you came on board at UMC, your annual salary rose to [NTD] 3.4 million. Was this the reason why you separated from Mainland brought its trade secret materials over to UMC?</p> <p>A: Not until I signed the employment contract with JHICC did I start to receive an annual salary of [NTD] 3.4 million beginning in July 1, 2016. I did take MMT materials to UMC. It was because I wanted to continue researching and studying. I gave no consideration to the fact that although UMC Samsung's technological trajectory, my accessing secret MMT materials at UMC still amounted to usage risks.</p>
J.T. Ho - Pg 31	2/14/2017	D-0000200_HT-00001	<p>Q: Why did UMC employees like you who signed the aforementioned employment contract with JHICC needed to open an account at Xiamen Bank?</p> <p>A: I don't know. It was around the time of our contract signing that CHEN Zhengkun told us to open an account at Xiamen Bank. The three of us – LI Fuzhe, GUO Fengming, and I – flew to Xiamen together. Once we arrived, JHICC personnel were there to take us from the airport to the bank so we could open our respective bank accounts. After doing so, we boarded a flight back to Taiwan on the same day.</p> <p>Q: Did you, LI Fuzhe, and/or GUO Mingfeng meet with anyone from JHICC's management team?</p> <p>A: Yes. It was JHICC employee(s) who took us to open the bank account. After that concluded, we did first stop to have lunch. A Taiwanese plant manager from JHICC, WU Kunrong, was present and accompanied us during the meal.</p>
J.T. Ho - Pg 32	2/14/2017	D-0000200_HT-00001	<p>Q: (Note: Property seized on February 7, 2017 numbered A-6; Property: WANG Yongming's cell phone, one chat captured on the Line app) On August 25, 2016, WANG Yongming expressed to you, "Big S said today that I must sign for four years in order to receive that bonus stipend from China...given my current circumstances, I don't know if I'd be able to hang on for four years...The Big Guy said that Sir RONG did recommend me..." Was he referring to the matter of WANG Yongming signing a contract with JHICC? What were the specific details?</p> <p>A: (After an examination) Yes. Both Big S and Big Guy referred to CHEN Zhengkun. It was CHEN who told WANG Yongming about the employment contract with JHICC. As for Sir RONG, that was RONG Letian. RONG was the one who recommended WANG to be promoted from team lead to department manager.</p>
J.T. Ho - Pg 33	2/14/2017	D-0000200_HT-00001	<p>Q: You belong to PM2. What are the respective responsibilities of PM2's Integration Department I and Integration Department II? Who is the department manager of Integration Department II?</p> <p>A: At UMC, we split the research and development of the DRAM F32 manufacturing process into six segments. Integration Department I is responsible for segments one, four, and five, whereas Integration Department II is responsible for segments two, three, and six. Integration Department II has a unit that is in charge of coordinating all photomask-related matters and the design rules for DRAM logic circuitry. The manager of Integration Department II is WEI Mingde.</p>
J.T. Ho - Pg 33	2/14/2017	D-0000200_HT-00001	<p>Q: What exactly do layout and design rule mean? Are there any differences?</p> <p>A: Layout is the top view of the whole DRAM product. The technical drawing looks down from above and shows the layout, design, and specs of the DRAM Integrated circuit. Integration Department II at UMC has team(s) tasked to coordinate with outside IC design vendors on photomask production and design rules. The guiding principle has been that UMC would establish rule(s) in accordance with its own capabilities, such as determining the smallest and largest ranges allowed for wire spacing. The IC design vendors would then follow the rule(s) in the design of the circuit design drawing (but now it may be that the IC design vendors would take the existing design layout and in turn dictate to us the rule(s) required). Then UMC would combine the circuit layout and the DRAM memory cell's memory range to produce the product's top view, or in other words, the complete layout.</p>
J.T. Ho - Pg 33	2/14/2017	D-0000200_HT-00001	<p>A: WANG Yongming did complain to me about how RONG Letian had asked WANG to do some comparisons of MMT and UMC design rules. However, I am not clear on the details. I don't even know if WANG ever followed through to help RONG. My feelings are that WEI Mingde and his team are capable of accomplishing this objective without the MMT design rules.</p>
J.T. Ho - Pg 34	2/14/2017	D-0000200_HT-00001	<p>A: Design rule was not part of WANG Yongming's job responsibilities...As for signing the employment contract with JHICC, that was arranged by CHEN Zhengkun.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 36	2/14/2017	D-0000200_HT-00001	<p>Q: After an examination of hardcopy documents that you gave to HUANG Shuhan for safekeeping prior to the search conducted by this Division's personnel on February 7, 2017, CHEN Yiling indicated, "The ABCs for integrating the manufacturing process (F68), Article Two, are materials on Rexchip Electronics's 68-nanometer production. If this document is given to some low-end mainland [Chinese] DRAM manufacturers, then they'd be able to engage in low-end DRAM production. Article Three's Prod Group: 26DDR3 QAC document is on the 40-nanometer manufacturing process. The document that is Article Four is information on the 72-nanometer manufacturing process. Articles Five to Fourteen are documents on the manufacturing processes of various DRAM products, and all are internal MMT secret documents. In the Article Fifteen file folder is an Elpida ECD-DFB-111 document on yellow LED light technology, which is exposure data on the manufacturing of DRAM product(s). All previously stated materials on the manufacturing process are MMT trade secrets." What do you have to say about this?</p> <p>A: ...I agree that the items labeled six, ten, eleven, twelve, and fourteen are MMT trade secrets. There are three documents under label eight.... Only the other two are MMT trade secrets, and of which I have no quarrel with."</p>
J.T. Ho - Pg 2	2/15/2017	D-0000254_HT-00001	<p>Question: When did you leave Micron Technology, Inc. and when did you start at United Microelectronics Corporation?</p> <p>Answer: I left in the middle of October 2015 and started at United Microelectronics Corporation on 5 November.</p>
J.T. Ho - Pg 2	2/15/2017	D-0000254_HT-00001	<p>Question: Have you traveled abroad in the previous year and this year?</p> <p>Answer: I traveled last year and visited Fujian once and Xiamen once. The first trip was to Jinjiang County in Fujian Province to check on the progress of factory building. The second trip was to open an account at Xiamen Bank. Upper management has stated that there's additional bonuses for participating projects like these.</p>
J.T. Ho - Pg 3	2/15/2017	D-0000254_HT-00001	<p>Question: Why open an account at Xiamen Bank?</p> <p>Answer: It is because the bonus is actually provided by Fujian Jinhua Integrated Circuit, Co., Ltd. (JHIC). My understanding is that they can't directly wire funds to banks in Taiwan.</p>
J.T. Ho - Pg 3	2/15/2017	D-0000254_HT-00001	<p>Question: (Reminder) You have signed a nondisclosure and intellectual property agreement with Micron Memory Taiwan on 24 February 2014. In the section in Term 8 of the agreement regarding returns, you have agreed to return any equipment or device to Micron Memory Taiwan that was developed, owned, or reproduced by you while under the employment of Micron Memory Taiwan or any device and records that are the possessions of Micron Memory Taiwan upon terminating the employment relationship with Micron Memory Taiwan. Do you remember this?</p> <p>Answer: I remember this. I indeed signed this agreement.</p>
J.T. Ho - Pg 4	2/15/2017	D-0000254_HT-00001	<p>Question: This agreement was signed while you were employed by the company. After you left your position, did you follow the agreement to return Micron Memory Taiwan related materials to Micron Memory Taiwan?</p> <p>Answer: No. I am not sure if Micron Memory Taiwan had asked me to return anything before I departed from the company. I do remember them telling me not to divulge any secret.</p>
J.T. Ho - Pg 4	2/15/2017	D-0000254_HT-00001	<p>Question: When the Prosecutors from this Office searched Micron Memory Taiwan for the first time on 7 February 2017, did you hand hardcopies, an USB flash drive, and your company assigned laptop from United Microelectronics Corporation that were at your desk to assistant engineer HUANG Shuhan?</p> <p>Answer: Yes.</p> <p>Question: Was this done by your own will or did someone instruct you to do so?</p> <p>Answer: This was done by my own will. I received the notification from RONG Letian that prosecutors were coming. He asked me if there was anything I needed to be careful of. I picked them up from my seat and wondered where I should put them. It just happened that I saw WANG Yongming hand items to HUANG Shuhan and asked HUANG Shuhan to hold on to them, but I didn't know what the items were. I was thinking I might as well hand my items to HUANG Shuhan as well.</p> <p>Question: What did you say to HUANG Shuhan?</p> <p>Answer: I was in the hurry so I am not sure what HUANG Shuhan did with them. The people conducting the search came in at that time. I asked HUANG Shuhan to keep them somewhere. Not long after I spoke to her, the prosecutors came into the office.</p> <p>Question: Where did RONG Letian inform you about the search?</p> <p>Answer: I am walking around working on other stuff. It was RONG Letian who approached to tell me that prosecutors were coming and reminded me to be mindful of my things.</p>
J.T. Ho - Pg 4	2/15/2017	D-0000254_HT-00001	<p>Question: Someone who did not do anything wrong typically would not be afraid of prosecutors or law enforcement coming to conduct a search. Why would RONG Letian feel the need to remind you?</p> <p>Answer: My understanding is he would've warned many people, such as WANG Yongming. He believes that those of us who came from other companies may sometimes accidentally bring some materials over from our previous employers.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
J.T. Ho - Pg 5	2/15/2017	D-0000254_HT-00001	<p>Question: Was the HP Laptop that you handed to HUANG Shuhan the one assigned to you by United Microelectronics Corporation?</p> <p>Answer: The computer I handed to HUANG Shuhan was the one that I requested from CHEN Zhengkun last year. I had requested a computer with capability to read USB for the convenience of work. CHEN Zhengkun then had his secretary arrange to acquire one for me.</p> <p>Question: Are you saying that you have two notebook computers in your possession?</p> <p>Answer: Yes, one of them has limited access and requires additional request to read USB. The other one is the above mentioned computer that I handed to HUANG Shuhan, which can read USB directly.</p> <p>Question: Who else, other than you, can use the computer that has capability to read USB?</p> <p>Answer: Yes. WANG Yongming and LI Fuzhe use it as well. Actually, it was both LI Fuzhe and I who requested for a laptop computer that can read USB.</p> <p>Question: Whose account did WANG Yongming and LI Fuzhe use when they are using that laptop?</p> <p>Answer: WANG Yongming would use my account and password to login. As for LI Fuzhe, I am not sure whether he used his account and password or mine.</p>
J.T. Ho - Pg 6	2/15/2017	D-0000254_HT-00001	<p>Question: Did the authorities allow you to log onto the above mentioned laptop with capability to read USB and review its contents during the investigation yesterday?</p> <p>Answer: Yes, but not thoroughly. When the investigators questioned if there is any materials on the computer, I told them that I have the habit of deleting files on it because it shouldn't store any controversial material.</p> <p>Question: Did the small flash drive that you handed to HUANG Shuhan, which was manufactured by KINGSTONE, belong to you?</p> <p>Answer: It was purchased from a group buying event while I was still employed at Micron Technology, Inc.</p> <p>Question: After your interview with the prosecutors previously as a witness, you voluntarily handed over a portable hard drive to be seized by the prosecutors. After CHEN Yiling, manager of the Real-time Defect Analysis Department of Micron Memory Taiwan, reviewed said portable hard drive, CHEN discovered that it contained manufacturing process related materials from Rexchip Electronics Corporation (predecessor of Micron Technology, Inc.). Is this correct?</p> <p>Answer: Yes, it should be manufacturing procedure.</p>
J.T. Ho - Pg 6	2/15/2017	D-0000254_HT-00001	<p>Question: Since you have direct access to read the files, why would you need to copy the files?</p> <p>Answer: Not all the information can be found on the internet and some of them are on the network disk. I used to go on business trip often, such as Japan for a month. It is very inconvenient for me to not have the materials on hand. This is the corporate culture of Micron Technology, Inc.</p>
J.T. Ho - Pg 8	2/15/2017	D-0000254_HT-00001	<p>Question: During your employment at United Microelectronics Corporation, do you still reference electromagnetic records that you obtained from Micron Technology, Inc. and the hardcopies printed from said electromagnetic records?</p> <p>Answer: Yes, I felt they would boost my personal knowledge.</p>
J.T. Ho - Pg 9	2/15/2017	D-0000254_HT-00001	<p>Question: During your employment at United Microelectronics Corporation, did you, connect the KINGSTONE flash drive to the above mentioned laptop with capability to read USB flash drive, and used said laptop to open electronic files from Micron Technology, Inc.?</p> <p>Answer: Yes. I would open and read the files. I found it helpful to increase knowledge for work purposes. I wanted to expand my perspective. This would be a demonstration of competency during meetings.</p> <p>Question: When was the last time you accessed the Micron Technology, Inc. electronic files?</p> <p>Answer: Starting from the moment I obtained the laptop that can access USB drive. It was around the end of 2015 or the beginning of 2016, it was also the time when we were about to start the discussion on DRAM.</p>
J.T. Ho - Pg 10	2/15/2017	D-0000254_HT-00001	<p>Question: Has any other United Microelectronics Corporation employee ever witnessed you openly handling and discussing said documents?</p> <p>Answer: I would hide myself when I read these documents. I only read them when others are not present.</p>
J.T. Ho - Pg 11	2/15/2017	D-0000254_HT-00001	<p>Question: Does the ASUS laptop seized from your office desk contain any Micron Technology, Inc. electronic file?</p> <p>Answer: That is not possible because it has no USB access.</p>
L.T. Rong Pg 2	2/14/2017	D-0000344_HT-00001	<p>I entered UMC in 1995 as a chief engineer at PED (Process Engineering Development) and entered Winbond Electronics Corp. in 1996 (hereinafter Winbond) as a Process R&D Engineer. Not long after, I was then assigned to Rise Inc., Winbond's associate, as an engineer. I entered ProMOS Technologies in 1997 as the TE process development director; came back to UMC as a TD (Technology Development) department manager. I became the RD department manager of Taiwan Semiconductor Manufacturing Co. in 2005 and joined Nanya Technology Corporation as a RD deputy director in the second half of the 2005. [I] returned to Winbond to serve as a RD director; employed by TMC Taiwan Memory Corp Limited in 2007 and job hopped to Rexchip Electronics Corporation in the same year before I joined Faraday Technology as the special assistant to the general manager in 2010. I became ATD (Advanced Technology Development) senior director of UMC in September, 2012 and got promoted to an assistant manager around January and February of 2013 and transferred to ST3 (Special Technology 3) as an assistant manager in December, 2014 and again, transferred to PM2 (Project Memory 2) as an assistant manager until now. These years may be off by one-year.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
L.T. Rong Pg 3	2/14/2017	D-0000344_HT-00001	A: UMC's chairman of the board is HONG Jiacong, CED YAN Bowen, senior vice presidents CHEN Zhengkun and JIAN Shanjie. In my recollection, CHEN Zhengkun is in charge of purchase and new business development (New Business Development, NBD in short) and others and JIAN Shanjie design service business [handwritten: and ST]. As I belong to NBD, CHEN Zhengkun is considered my direct supervisor. Below NBD are PM1 (Project Memory 1), PM2 and PM3 and I am the head of PM2, in charge of integration business, supervising DM, P11, P12 and Device departments, with GUO Fengming being the DM department manager, HE Jianting P11's department manager, WEI Mingde P12's department manager and WANG Yongming Device's department manager, altogether some forty employees. PM1 is supervised by Assistant Manager ZOU Shifang, who is in charge of optimization of each single step in the process, and is staffed with some eighty employees. PM3's supervisor is Senior Director Jason (whose Chinese name I can't recall), who is in charge of product-related business with staff under 10.
L.T. Rong Pg 3	2/14/2017	D-0000344_HT-00001	My English name is directly translated from my Chinese name Le-Tien Jung and my coworkers at UMC call me Jung sir.
L.T. Rong Pg 4	2/14/2017	D-0000344_HT-00001	Q: During your employment as a PM2 assistant manager, what are your responsibilities? How is the division of work internally? A: I am in charge of departmental development and coordinating departmental businesses. DRAM process was divided into five stages, which were STI (shallow trench isolation) shallow trench isolation, BWL (burried word line)/BLG (bit line gate) buried word line/bit line gate, SC (storage contact) storage contact, SN (storage node) storage node, BEOL (back end of line) back end of line. DM (Defect Management) department is in charge of product defect management; for any defects that happen on the machinery platforms, this department has to find the causes to assist the machinery platforms to function normally. P1 (Process Integration 1) department is in charge of the management development of STI, SC and SN processes. P12 is responsible for the BWL/BLG and BEOL developments. Device department is mainly responsible for component engineering, which conducts component designs as DRAM is composed of tens of millions of components.
L.T. Rong Pg 4	2/14/2017	D-0000344_HT-00001	Q: When was the NBD Department established in UMC? What was the purpose of its establishment? A: As I have been employed by a DRAM company before and have relevant R&D background, CHEN Zhengkun asked me in 2016 if I had the intention to join the NBD department. With my consent, I joined the NBD department on March 1, 2016. The NBD department was UMC's newly established department and after I joined the department I mainly conduct DRAM's R&D.
L.T. Rong Pg 5	2/14/2017	D-0000344_HT-00001	Q: How much time is needed for the R&D of Design Rule or Layout Rule? A: It takes a long time for the R&D of Design Rule or Layout Rule. Principally, it needs more than half year to just formulate the Layout Rule; once the Layout Rule is preliminarily formulated, it will be turned to P11 and P12 engineers for confirmation to ensure if the Layout Rule meets the current condition to be executed while the Layout Rule will also be sent to [our] customers Ultra Memory Inc. and Elite Technology for design to ensure the Layout Rule is executable. As the newly formulated Layout Rule may have many imperfections or errors, it needs constant modifications and improvements in the process to meet customers' requirements and mass production. With UMC's R&D for F32 DRAM as an example, WEI Mingde's P12 department is in charge of the Layout Rule, which took them approximately half year just to formulate the preliminary Layout Rule. The current Layout Rule is the version 0 which must go through multiple modifications and test runs before it becomes version 0.1 or version 0.2. The R&D will continue until it becomes Layout Rule version 1 to meet the market criteria with higher reliability for mass production.
L.T. Rong Pg 6	2/14/2017	D-0000344_HT-00001	Q: Is the Layout Rule of all DRAM plants congruent? Can it be referenced or adopted? A: Every DRAM plant's Layout Rule is different, no one rule for all, and it doesn't have any referencing value except some important key pitch.
L.T. Rong Pg 7	2/14/2017	D-0000344_HT-00001	When Taiwan's DRAM plants suffered from losses and bankruptcy approximately in 2008, the main reason was because they didn't have their own technology; therefore, when UMC intended to establish its DRAM R&D team, I was very happy to join. Once UMC succeeds in developing it, Micron will be the first one to suffer due to its technological backwardness.
L.T. Rong Pg 7	2/14/2017	D-0000344_HT-00001	Q: What are your relationships with WANG Yongming, WEI Mingde, HE Jianting and CHEN Zhengkun? A: When I served as the deputy director at Rexchip in 2008, CHEN Zhengkun was Rexchip's general manager and two of we had business contacts, which is how I got to know CHEN Zhengkun. It was mostly business contacts between CHEN Zhengkun and I without personal friendship; WEI Mingde was originally employed at UMC's ATD department and after I participated in the DRAM's R&D, some colleagues recommended to me that WEI Mingde had R&D capability in Design Rule; so I poached WEI Mingde over to P12 as the department manager. All WEI Mingde and I had was only business contact, no personal friendship except occasional gatherings. HE Jianting joined the PM2 organization earlier than I did and only when I started participating in the DRAM project that I got to know HE Jianting, with whom I only had business dealings as well, no personal relations except occasional gatherings. WANG Yongming came to UMC for an interview, which was conducted by me and which was how I first came to know WANG Yongming. I offered WANG Yongming the job for his electrical experience in DRAM. At first, WANG Yongming held the position of technical manager of the Device department and later, because of his good performance, I promoted WANG Yongming to the manager of Device department. My dealings with WANG Yongming are also all business, no personal relationship.
L.T. Rong Pg 15	2/14/2017	D-0000344_HT-00001	A: As I said above, I did inquire WANG Yongming at the time if he had any opinions about the Design Rule and WANG Yongming then proactively provided me the revised UMC Design Rule, which I then turned to WEI Mingde, who then actually had a discussion with WANG Yongming and used this information to revise data. As for how much of WANG Yongming's revised data WEI Mingde used, I do not know; and has the data WANG Yongming provided actually benefited UMC, it depends on the eventual result of the DRAM development. If the data WANG Yongming provided all met [the requirement] without failure, it could be beneficial to DRAM; if the data WANG Yongming provided needed revision, it then was not helpful to DRAM's development.

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
L.T. Rong Pg 17	2/14/2017	D-0000344_HT-00001	<p>Q: When WANG Yongming took an interrogation with the prosecutor on February 8, 2017, the prosecutor questioned "Would WEI Mingde know that the parameters you used for modifications was from Micron's Design Rule?" To this, WANG Yongming replied, "As there were changes and marks because the first edition was formulated by them while what I revised was what I knew from the DRAM information. I believe in the previous discussions, [we] did say that we would revise the Design Rule with such method, which was when the three individuals—RONG Letian, WEI Mingde and me—participated in the discussion at the time around July and August of 2016, as I can remember, location is the big conference room toward outside and the content of the discussion was to use Micron's Design Rule as reference." Apparently, both WEI Mingde and you knew that the Design Rule information WANG Yongming provided came from Micron's data. Do you have any justification or explanation on this?</p> <p>A: WEI Mingde, WANG Yongming, others and I discuss all the time and I also welcome department heads to come with ideas for the Design Rule. I remember in addition to the Design Rule information WANG Yongming provided, Program Manager Yoshihiro Nagai also provided related data regarding Design Rule's small periphery while Korean and Japanese vendors, Technology Manger HUANG Caiyu also input his thoughts on asymmetrical elements, which eventually was not adopted, I have no recollection that I discussed with WANG Yongming and WEI Mingde and others, neither did [I] decide to use Micron's Design Rule as reference. Micron's Design Rule is only one of the targets for reference while Korean and Japanese and other vendors are also our targets for reference on Design Rule.</p>
L.T. Rong Pg 18	2/14/2017	D-0000344_HT-00001	<p>A: I always encourage department heads to speak up and communicate more at the morning meetings; as WANG Yongming was formerly employed at Micron Memory Taiwan, I have the impression that I should have asked WANG Yongming to do a comparison between Micron Memory Taiwan and UMC in terms of the design rule. As there was a vacancy for the position of Device Manager, WANG Yongming might think this could be my test for him and an opportunity for him to shine, so WANG Yongming later did provide me with UMC's design rule. In addition to requesting WANG Yongming to assist with the formulation of the design rule, I also asked and encouraged that other department heads offer their support and assistance to the design rule.</p>
L.T. Rong Pg 19	2/14/2017	D-0000344_HT-00001	<p>Q: When you knew that our department was going to search aiming at WANG Yongming's space, did you notify WANG Yongming or anyone else this information?</p> <p>A: When I heard about it, I went to WANG Yongming's desk and told WANG Yongming that someone was coming to search him. I asked him, "Do you still have information from your former company?" and Wang Yongming replied, "Not hardcopy, just electronic files." I then asked WANG Yongming angrily, "Why do you still keep them? Why haven't you deleted them yet?" I then walked back to my own office.</p>
L.T. Rong Pg 19	2/14/2017	D-0000344_HT-00001	<p>Q: When WANG Yongming learned that our department was going to search his space, did he delete or hide Micron's electronic files?</p> <p>A: I saw WANG Yongming working on the laptop on his desk, but I didn't see the content WANG Yongming was working on; my educational guess was he was taking the actions of deleting.</p>
L.T. Rong Pg 8	2/14/2017	D-0000366_HT-00001	<p>Q: Should DESIGN RULE be considered a trade secret in all semiconductor companies (which contains confidentiality, profitability, and security measures)?</p> <p>A: Yes, I believe this is what all of them have been doing.</p>
WU Guo Hao Pg 7	2/14/2017	D-0000326_HT-00001	<p>Question: Has Letian RONG, Mingde WEI or Yongming WANG ever provided DRAM design rule for modification? What exactly happened?</p> <p>Answer: Only Yongming WANG has. When the design diagram provided by Yongming WANG did not meet UMC's specifications of the design rule and process capability, he would work out with the process through me to reasonably modify the design rule. Since UMC did not have a direction in developing F32 DRAM, and Yongming WANG has experience working in a big company making DRAM (later I learned it was Micron), so when Yongming WANG developed the DRAM component diagrams, he thought that the specifications from his previous company had higher standard and better precision; therefore, he hoped the P12 Department could communicate with the Process Management Division to improve the components to a certain level so that UMC could make better products reaching the standard of his previous company. He kept saying that UMC should not have used such low specifications with today's technology, so when the design rule from the P12 Department was unable to achieve the Dram component diagram that he developed, Yongming WANG proposed to Director Mingde WEI in the second half of 2016 to reference the design rule data from the Dram company he previously worked at to improve UMC's process capability. I contacted Yongming WANG after Mingde WEI instructed me and I provided the design specifications of the design rule in paper to Yongming WANG, and Yongming WANG would modify the design rule data in this paper based on his previous experience from the DRAM company (due to the internet security policy, the external electronic files are not allowed to transfer to UMC's computers) and returned it to me to discuss with the supervisor and engineers of the Process Division. The discussion with the customers in Japan also took place. The duration for this particular modification (unsure which version it was at the time) lasted about a month. I improved the process precision based on this for the F32 DRAM products for UMC and provided the report to P12 Director Mingde WEI.</p>
WU Guo Hao Pg 9	2/14/2017	D-0000326_HT-00001	<p>Question: For the modification you and others from the P12 Department set up and all the design rule data revised according to the design specification Yongming WANG provided, was this modification used on the F32 DRAM products in the cooperative development agreement with Jinhua from China? How are product rights distinguished?</p> <p>Answer: Yes. All the design rule data modifications based on the design rule data from Yongming WANG's and the setup from P12 Department would be discussed with the Process end and would be applied after revision to the F32 DRAM products in the cooperative development agreement with Jinhua from China.</p>
WU Guo Hao Pg 12	2/14/2017	D-0000326_HT-00001	<p>Question: (Presented: Seized Evidence A-2-2. Evidence's name is "Document Information") Which specification is "32nm DRAM Process Topological Layout Rule"? Is it the UMC design rule data in paper that Yongming WANG modified that you previously mentioned?</p> <p>Answer: (After reviewing it) The 32nm DRAM Process Topological Layout Rule is the design rule specification for UMC's F32 DRAM, which is the document for design rule data that Yongming WANG modified based on his past job at a DRAM company that I mentioned. He modified from the earliest version, mainly Version 1 and Version 2. After Yongming WANG modified the document manually, I would discuss it with Process Division based on the data that he modified to see if it was feasible for the Process Division. If feasible, I would produce a new version based on this data. This document that you presented is Version 3 (Ver. 0.1_P.3). Version 4 is the final version. The design specifications for F32 DRAM design rule from UMC is "32nm DRAM Process Topological Layout Rule (Ver. 0.1_P.4)", the final version that has been converted to a program code and sent/mailed to the customers in Japan (as it involves the company's trade secrets, I cannot disclose) for customers to execute the program and modify the design diagrams.</p>

Name of Interviewee and pg. # of Tr.	Date of interview	Bates	QUOTE/STATEMENT (Translated)
WU Guo Hao Pg 13	2/14/2017	D-0000326_HT-00001	<p>Question: In the second half of 2016 when Yongming WANG evaluated the design rule from PI2 Department that was unable to achieve the DRAM component diagram that he developed, Yongming WANG proposed to PM2 Director Mingde WEI to reference the design rule data from his past design rule experience from a DRAM company in order to increase UMC's process capability, who did Director Mingde WEI assign to be Yongming WANG's counterpart from PM2 to modify the design rule data? Did Director Mingde WEI request for a progress report?</p> <p>Answer: Yongming WANG proposed to PM2 Director Mingde WEI in the second half of 2016 to reference the design rule data from his past design rule experience from a DRAM company to increase UMC's process capability; Director Mingde WEI then assigned me to work as the counterpart for the design rule data that Yongming WANG modified. Director Mingde WEI also requested me to report the progress after he assigned me the job. I provided the modification progress of the design rule data in writing to Chief Letian RONG, Director Mingde WEI and Manager Jianyan CHE in PM2's weekly meeting on every Tuesday.</p>
WU Guo Hao Pg 17	2/14/2017	D-0000326_HT-00001	<p>Question: Yongming WANG provided the data from his past experience in Micron as a reference for design rule specification in UMC, did it include ion Implant data? What's the detail?</p> <p>Answer: Yes, Yongming WANG provided the design rule data, including ion implant data, from Micron where he used to work to UMC. The ion implant data provided by Yongming WANG still required experiments before it could be achieved in the Process Department. As the ion implant experiments do not need much tape out, so the old process is able to execute [the experiment.] After Yongming WANG provided the suggested modified data for ion implant, he would lead the Device Department to conduct experiments with Diffusion Department. If his suggested modified data matched the experiment results, it would be included in the design rule specifications.</p>
WU Guo Hao Pg 18	2/14/2017	D-0000326_HT-00001	<p>Question: Yongming WANG provided the design rule specification rule data from his past employment in Micron to UMC as a reference and also verified it with experiments in the Process Department, did it improve the accuracy of UMC's F32 DRAM? Did it increase the specification standard for the design rule?</p> <p>Answer: Yes. The design rule provided by Yongming WANG from his past employment in Micron was very challenging for the Process Department. He would decrease the size of the chips from small to smaller, so more chips could be produced from a wafer, which would decrease the production cost but increase the difficulty level to the Process Department. The design rule data he provided for UMC as reference with the feasibility verified with experiments in the Process Department doubtlessly helped to increase the accuracy in UMC's F32 DRAM and the specification standard for the design rule.</p>
WU Guo Hao Pg 19	2/14/2017	D-0000326_HT-00001	<p>Question: After the Process Department verified the feasibility with experiments for design rule data provided by Yongming WANG, was it incorporated into each version of "32nm DRAM Process Topological Layout Rule" Ver. D.1? Did it also complete the design rule program codes? Were the program codes submitted to the customers?</p> <p>Answer: Yes. After the Process Department verified the feasibility with experiments for design rule data provided by Yongming WANG, it would be incorporated into each version of "32nm DRAM Process Topological Layout Rule" Ver. 0.1. After the 4th version of 0.1 (Ver. 0.1_P4) was finalized, the level for research and development was considered complete (Note: Ver. 1 is the level for mass production); therefore, the design rule program codes were completed and submitted to the customers in Japan. But I'm not sure if Jinhua from China received the R&D level or production level during the technical transfer, so I do not know whether Jinhua has obtained the design rule program codes or not. Anyway, Jinhua will eventually obtain the technology from UMC's F32 DRAM.</p>
WU Guo Hao Pg 20	2/14/2017	D-0000326_HT-00001	<p>Question: Mingde WEI's written record from today (the 14th) states that "Letian RONG gave me a few sheets of paper with handwritten DESIGN RULE parameter values and told me that I could discuss them with Yongming WANG... My impression is that after Letian RONG gave me the sheets of paper with handwritten DESIGN RULE parameter values, I gave the papers to Guohao WU and also went with Guohao WU to conduct a discussion with Yongming WANG." Was Mingde WEI's statement true? Do you have any explanation about this?</p> <p>Answer: Mingde WEI's statement is true. I remember right after I transferred to the PM Division, Mingde WEI gave me a few sheets with hand-written DESIGN RULE parameter values. I am not sure if I went with Mingde WEI to discuss them with Yongming WANG, but I remember discussing them with Yongming WANG.</p>
WU Guo Hao Pg 20	2/14/2017	D-0000326_HT-00001	<p>Question: Mingde WEI's written record from today (the 14th) also states, "We filled in the LAYOUT RULE based on the information provided by Yongming WANG. The 32-nano DESIGN RULE from UMC was missing the relevant ion implant data, so we asked Yongming WANG to provide... I remember about the information from a management meeting when I provided the briefing on the production progress on the DESIGN RULE to Letian RONG that the engineers had difficulties and concerns in application precision when formulating ion implant data with the 65-nano process logic for the 32-nano DRAM. I don't remember if Letian RONG assigned Yongming WANG to help at that time, but Letian RONG gave me some information later (around September 2016, unsure of the exact date) and told me I could discuss with Yongming WANG if I had questions. The information Letian RONG provided to me that day also included the statement Yongming WANG provided earlier to your Office today (the 14th) that he used the ion implant data from Micron. When I got the information I gave it directly to Guohao WU. I also instructed Guohao WU to fill the 32-nano DRAM TOPOLOGICAL LAYOUT RULE Yongming WANG provided in the designer draft manual..." Is Mingde WEI's statement true?</p> <p>Answer: Mingde WEI's statement is true, but I would not know the specific instruction Letian RONG made to Mingde WEI. Earlier I mentioned about the Device Department led by Yongming WANG provided a briefing in a PM2 meeting regarding the ion implant data. Chief Letian RONG and Director Mingde WEI were on the site at that time. Later, Director Mingde WEI did give me the data Yongming WANG provided for me to consolidate and put into the content of each version for "32nm DRAM Process Topological Layout Rule" Ver. 0.1. After that, Yongming WANG also provided me with the ion implant data successively. The direction for the Process Department in UMC would include the design rule design specifications after verifying the feasibility with experiments to increase the precision of F32 DRAM products.</p>
Sandy Kuo/GUO Perishan Pg 2	2/8/2017	D-0000502_HT-00001	<p>Q: Please describe in detail why you went to work for UMC?</p> <p>A: I left Micron in February, 2016, and started working at UMC in March [2016]. I am currently assigned at the New Business Development Center, where research and development is being conducted for the DRAM technology. CHEN Zhengkun, who left [Micron] to work for UMC prior to my departure from Micron, is the main person who oversees the New Business Development Center at UMC. After CHEN Zhengkun left to work for UMC, I initiated in making contact and asked if he has an opening suitable for me at UMC. After several discussions, CHEN Zhengkun indicated he was in need of a person to handle administrative, internal communications and coordination matters for his new team, so he asked me to make a move to UMC. At UMC, even though my salary remained the same, to me, more importantly, is the company's work atmosphere and a sense of collaboration, that was why I made the switch. My work at UMC mainly deals with the administrative side and communications coordination for the office, I do not come in contact with DRAM or wafer etc. It is not my turf nor do I have an understanding of this type of high technology, that is why my responsibilities have nothing to do with that particular area.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
Sandy Kuo/GUO Perishan Pg 4	2/8/2017	D-0000502_HT-00001	<p>Q: Do you have an English or an alias name?</p> <p>A: My English name is Sandy but I don't have an alias name. Since I started working, I have always used my English name Sandy.</p>
Sandy Kuo/GUO Perishan Pg 4	2/8/2017	D-0000502_HT-00001	<p>As to whether they were finally employed by Jinhua, CHEN Zhengkun would make that final decision. That is because UMC's New Business Development Center engages primarily in DRAM research and development, while Jinhua engages in DRAM production. Since the New Business Development Center and Jinhua collaborate on the DRAM technology's technical development and exchange, CHEN Zhengkun is the one to make a final decision on whether or not to hire CHEN Shiyuan and WU Xindong; if they were hired, the type of position they will be assigned to at Jinhua, while my role is in coordination and communications between the parties.</p>
Sandy Kuo/GUO Perishan Pg 4	2/8/2017	D-0000502_HT-00001	<p>Q: During your employment with Micron, were you allowed to access all of the relevant DRAM documents?</p> <p>A: I didn't have access rights to Micron's DRAM documents and related materials. Only technical personnel based on individual ranking working with DRAM and its related materials are authorized. I don't have authorization to even access the website.</p>
Sandy Kuo/GUO Perishan Pg 8	2/8/2017	D-0000502_HT-00001	<p>Q: You and CHEN Zhengkun went together to Mainland China on February 6, 2017, did you two go to Jinhua? What for?</p> <p>A: Yes, CHEN Zhengkun and I went together on February 6, 2017 to Mainland China's Jinhua company. We were there mainly to visit the Taiwanese managers and check on their living conditions. In the afternoon of February 6, 2017, we went to the Jinhua's jobsite for an inspection. In the evening we had dinner with Mayor ZHANG Wenxian of Jinjiang City. On February 7, we met Jinhua's Deputy Director, LU Wensheng, to talk about the factory's construction progress at the jobsite. We then had lunch at noon with LU Wensheng and Taiwanese managers XU Naien and WU Xindong. We continued to have meetings with LU Wensheng in the afternoon to discuss the contractual matters of the worksite. In the evening we had dinner with Jinjiang City's Secretary, LIU Wenru. On February 8, 8AM, we boarded a Xiamen Airline flight for our return to Taiwan. During most of our trip, I was with CHEN Zhengkun and we were doing a lot of talking with the local people. I would make a point to excuse myself on occasions when CHEN Zhengkun needed to talk with LU Wensheng in private.</p>
Sandy Kuo/GUO Perishan Pg 8	2/8/2017	D-0000502_HT-00001	<p>Q: According to our investigation, in October, 2016 UMC assisted Mainland China's Jinhua Company to recruit talents in Silicon Valley, USA, were you involved? Details?</p> <p>A: Yes, I went on the same trip to Silicon Valley, USA. It was around the timeframe of October 20, 2016, when personnel from Taiwan and Mainland China made their respective trips to San Francisco, USA. ZHANG Wenxian, the Mayor of Jinjiang, and KANG Tao, the Mayor of Quanzhou, and several Quanzhou City officials totalling four to five people went on the trip from Mainland China. The UMC side had CHEN Zhengkun, myself, YOU Zhenfu, and WANG Renfen of HR, totalling four people. Additionally, Jinhua's WU Kunrong departed from Taiwan's Taoyuan International Airport, all of us attended the "Chinese American Semiconductor Professional Association (CASPA)" annual meeting. [CASPA] held a special session for Jinhua, with WU Kunrong on stage to promote Jinhua's platform, including an introduction of Jinhua's present business standing and offer of his welcome to those who are interested in working for Mainland China's Jinhua Company. For reason that Jinhua does not have a branch in the U.S., those interested in working for the company must work in Mainland China. I recall the annual meeting lasted three days, and we were there for two days. Aside from attending the annual meetings, we also went sightseeing, but I have forgotten how many days total we spent in the U.S. During our San Francisco stay, in addition to attending the CASPA's annual meeting, we also met some U.S. semiconductor equipment vendors. I recall there were three vendors: "Applied Materials", "Lam Research Corporation", and I forgot the name of the third vendor, who we met for the first time. And because Jinhua would need to purchase equipment in the future, these vendors introduced their company products and other relevant information to Mayor ZHANG Wenxian and Mayor KANG Tao. However, I have no way to be sure if these vendors are currently collaborating with the Jinhua company, but they should still be working with UMC.</p>
Sandy Kuo/GUO Perishan Pg 9	2/8/2017	D-0000502_HT-00001	<p>Q: Do you know CHEN Zhengkun? What kind of relationship is it? Have you had any monetary exchange or differences?</p> <p>A: I came to know CHEN Zhengkun in 2008, after I got a job at Rexchip. CHEN Zhengkun was Rexchip's General Manager. Although I had a direct supervisor for public relations affairs which I was responsible for, I also accepted directives from CHEN Zhengkun. CHEN Zhengkun and I can be regarded as long-time colleagues with a good relationship. He would give me directives to handle tasks in the public relations and media sector, in addition to administrative issues as well as communications and coordination. In private, we have no personal differences nor monetary exchanges.</p>
Sandy Kuo/GUO Perishan Pg 10	2/8/2017	D-0000502_HT-00001	<p>Q: On July 16, 2016 Jinhua held a groundbreaking ceremony in Quanzhou, Jinjiang County, Fujian Province, did you participated? What are the details?</p> <p>A: Yes, I recall those UMC representatives included myself, CHEN Zhengkun, and Director HONG Jiacong in groundbreaking ceremony. HONG Jiacong flew in by himself, CHEN Zhengkun and I flew on the same flight. Also, a number of Mainland China's scholars, officials, and foreign equipment vendors also participated at the groundbreaking ceremony. The local government of Jinjiang threw a dinner banquet in the evening. Moreover, the Jinjiang local government held a forum on Integrated circuit, and invited a number of scholars and experts to speak and lecture on stage. A Taiwanese scholar named LU Chaoqun of a certain semiconductor association also attended the forum. I recall spending three to four days [in Jinjiang].</p>
Stephen Chen Pg. 1	2/8/2017	D-0000584	<p>Q: Experience? Current employment?</p> <p>A: After I retired from military service in 1989, I was employed at Silicon Integrated Systems [SiS], Acer Semiconductor Mfg. Inc. Semiconductor Co., Ltd. and Yuefeng Electronic Materials Co., Ltd. I left Yuefeng Electronics as an engineering manager during 1995 and 1996 and moved to Powerchip Semiconductor (later changed to Powerchip Technology Corp., hereinafter Powerchip) and served as manager, deputy director, director, assistant vice president, vice general manager, senior vice general manager, etc. During 1995, as Powerchip and Elpida-Japan set up Rexchip Electronics Corp. (hereinafter Rexchip) in Taiwan by joint venture, so I, being the senior vice general manager of Powerchip, served as part-time at Rexchip as general manager and became the general manager full-time at Rexchip. During August of 2012, Micron Technology, Inc., USA (hereinafter MTI) purchased Elpida Memory [Japan] and the Rexchip Corp. that Elpida Memory established in Taiwan; thus, Rexchip changed name to Micron Memory Co., Ltd. Taiwan (hereinafter Micron). Former Rexchip's chair (whose name I don't remember) resigned for this reason and I became the general manager and chair of Micron with my status as a professional manager. I resigned on July 31, 2015 due to my personal career planning and served senior vice general manager of United Microelectronics Corporation (hereinafter UMC) to this day.</p>

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Stephen Chen Pg. 2	2/8/2017	D-0000584_HT-00001	<p>Q: What is UMC's organizational structure?</p> <p>A: UMC's chairman of the board is HONG Jiacong, in charge of comprehensively overseeing all businesses of the company; the chief executive officer is YAN Bowen, in charge of UMC's operational management; under CEO there are three senior vice presidents and more than 10 vice general managers, of whom Senior Vice President WANG Shi is in charge of the U.S. business and headquarters' planning and management; Senior Vice President JIAN Shanjie is in charge of special technology development and marketing; I am in charge of supervising the business under Vice President LIAO Muliang's jurisdiction (plant construction, public security, purchasing), business under XU Xingren's jurisdiction (engineering service management, analysis test, mask production) and project technology development, under which two assistant vice presidents, who are Assistant Vice President ZOU Shifang of PM1 and Assistant Vice President RONG Letian of PM2.</p>
Stephen Chen Pg. 3	2/8/2017	D-0000584_HT-00001	<p>Q: You previously claimed that you were in charge of UMC's special project technology development; what are the special project you are currently in charge of supervising?</p> <p>A: The special project I'm currently in charge of supervising is the DRAM-related technology business Fujian Jinhua Integrated Circuit, Co., Ltd. (hereinafter Jinhua Co.) of mainland entrusted UMC to develop. UMC's Special Project Director HUANG Bowen started to negotiate with Fujian Jinhua from mainland around January and February of 2016 about this special project. UMC's primary business is wafer foundry fabrication while it used to engage in DRAM development and manufacturing in the earlier stage with related experts, but the DRAM development and manufacturing discontinued and the staff moved to other technology units. I'm not sure when the DRAM related business ended because I am not a senior UMC employee; however, UMC hasn't engaged in DRAM fabrication business for the past seven or eight years. A newly established company, Fujian Jinhua Co. is planning to set up a DRAM manufacturer in Jinjiang County, Quanzhou, Fujian. Although Jinhua has capital, it doesn't have the technology for developing DRAM; thus, Jinhua is hoping to find partners for technology development while UMC is hoping to improve technology for DRAM through such cooperation to provide customers more options. Jinhua will provide part of the funds for the DRAM technology development. Once UMC completes the development, UMC will co-own the DRAM technology with Jinhua in the mainland and has the right to provide customer service with this DRAM technology in Taiwan. UMC signed the technology cooperation agreement with Fujian Jinhua in May of 2016 to confirm the cooperation relationship.</p>
Stephen Chen Pg. 4	2/8/2017	D-0000584_HT-00001	<p>A: Being UMC's senior vice president, I'm supposed to conduct feasibility assessment for the future technology I assigned two assistant vice presidents who had engaged in DRAM development, ZOU Shifang and RONG Letian, who were in charge of the 12-inch wafer R&D from the Advanced Technology Development (ATD) of Taiwan Science Park to set up earmarked project management unit PM1 and PM2 with ZOU Shifang being the assistant vice president for PM1, in charge of module technology development while RONG Letian the assistant vice president for PM2, in charge of memory-related element technology development. ZOU Shifang and RONG Letian are the first-level supervisors that came to help upon my request. They were authorized by PM1 and PM2's second-level (with the titles as department manager, senior manager or vice director) and third-level (with the title as manager) supervisors to find people or conduct interviews and finally the reassignment or hiring approval are through me. PM1 and PM2's organizational structures were established around January and February of 2016.</p>
Stephen Chen Pg. 4	2/8/2017	D-0000584_HT-00001	<p>Q: Have you ever taken a business trip to Mainland China because of UMC's cooperative project with Jinhua?</p> <p>A: Yes, I have. Starting from the second half of the year 2016, I went on business trip to Mainland China approximately every month because of the cooperative project with Jinhua, primarily to get a grasp on the status of Jinhua's building the DRAM manufacturing plant in Jinjiang County of Quanzhou city of Fujian province in the mainland.</p>
WEI Mingde Pg. 4	2/14/2017	D-0000598_HT-00001	<p>Q: When our office completed with the search on February 7, 2017, did any UMC executives or supervisors call related personnel for a discussion or how to deal with subsequent judicial investigation?</p> <p>A: Around 1PM on February 8, 2017, supervisors at and above levels of directors of the PM1 and PM2 were convened to have a meeting at P5-217 conference room. At the meeting, Chair HONG Jiacong told us that all of UMC's earmarked project development was independent development, rather than acquired from other companies' secrets. In my impression, the meeting only lasted for 20 minutes before it was adjourned.</p>
WEI Mingde Pg. 9	2/14/2017	D-0000598_HT-00001	<p>Q: When did UMC start the production of the design rules for the R&D of 32nm DRAM? Did UMC specifically named the 32nm DRAM R&D design rule Layout Rule?</p> <p>A: As I stated before, when RONG Letian asked me to join PM2, he was hoping that I could lead the team to complete the 32nm DRAM Design Rule. WU Guohao was originally a subordinate of mine at ATD department, since I could only transfer to ATD at the end of June 2016, WU Guohao therefore transferred to PI2 in mid-May 2016 and, per my instruction, started the planning for the 32nm DRAM Design Rule. When I took over PI2 as manager at the end of June 2016, WU Guohao continued to follow my instructions in formulating the 32nm DRAM Design Rule. Within UMC, the 32nm DRAM Design Rule is called "Topological Layout Rule," which in general is referred to as Design Rule.</p>
WEI Mingde Pg. 9	2/14/2017	D-0000598_HT-00001	<p>Q: WANG Yongming stated to our office on February 7, 2016 that "...in order to come up with the design rule quickly, I was asked to find a way to provide for his reference the DRAM design rule from Micron or the Elpida Company; so I downloaded Elpida's DRAM design rules from Micron's confidential business information backed up on Google Drive, and printed them out on paper; after referencing portions of this information, I filled out what I thought was feasible several sets of width and space numbers on each of the ten plus pieces of UMC design rule paper...I recall giving RONG Letian more than ten sheets of UMC design rule in paper form; the design rules should have belonged to PI2, the New Business Unit (WEI Mingde as manager)...manager of the PI2 unit WEI Mingde can verify what I said above is true because after WEI Mingde got the design rule (should have been turned over to him by RONG Letian because it was the same initial copy as the one I gave to RONG Letian), he then came directly to me asking how to determine the other parameters (because, originally, the remaining parameters were not written in Micron's design rules, so I didn't write out this part for RONG Letian). So I figure RONG Letian was the one who told him that I provided this design rule; besides, WU Guohao [STC 1675/0948/6275], working under WEI Mingde's, and another person (I forgot the name) came to me afterwards asking how to set the parameters. I replied with the same answer "if there isn't any, then you can write it for UMC", that was when I let them handle the situation on their own." Was WANG Yongming's description truthful? Did RONG Letian and WANG Yongming provided you with the DRAM Design Rule information as a reference to produce the 32nm DRAM Design rule? Can you elaborate? Why was the design rule provided with WANG Yongming's assistance?</p>

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Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
			<p>A: Yes, what WANG Yongming said was true. I remember in and around September of 2016, RONG Letian asked me to see him in his office, it was just me and RONG Letian; RONG Letian gave me several handwritten pieces of papers with Design Rule parameter values, telling me that I could discuss this with WANG Yongming, but I don't remember if RONG Letian told me who wrote these Design Rule parameter values. I also believed at the time that since WANG Yongming spent a long time working at a DRAM plant, it is worth using his experience as reference. In addition, the DEVICE Department that WANG Yongming was in charge of was carrying out the Test Key portion; we were told in September/October of 2016 about certain poorly designed Design Rule that makes the Test Key at this end impossible to proceed, so it is their hope that we'd make change[s] to the Design Rule. The impression I have is that following receipt of the Design Rule parameter value papers from RONG Letian, I did turn them over to WU Guohao, and went together with WU Guohao to discuss with WANG Yongming for suggestion of these values from WANG Yongming's Test Key design perspective. As for the Design Rule parameter values suggested by Wang Yongming, it is placed in the 32nm DRAM Designer Manual TOPOLOGICAL LAYOUT RULE items, but I'm not able to interpret the particular embedded items, you may be able to get a better picture by asking WU Guohao.</p>
WEI Mingde Pg. 11	2/14/2017	D-0000598_HT-00001	<p>Q: Referring to the same seized item above, where is the source of the data produced by the PI2 department?</p> <p>A: We made references to the handwritten Design Rule parameter value information given by RONG Letian to me in and around September, 2016, which was incorporated into UMC's 32nm DRAM Topological Layout Rule design rule third edition draft, and forward it to Ultra Memory Inc. for it to check if the design rule we provided is feasible. Upon feedback from Ultra Memory Inc., we would use it to make revisions and sent a newly edited copy to Ultra Memory Inc. for examination.</p>
WEI Mingde Pg. 13	2/14/2017	D-0000598_HT-00003	<p>Q: When WANG Yongming provided the design rule data from his former DRAM company's Design Rule to assist in enhancing UMC's process capability, did it help to shorten the progress in the schedule?</p> <p>A: I don't think the design rule data provided by WANG Yongming's Design Rule helped with progressing the project schedule as a whole, but it did help in enhancing the design rule data precision of UMC's Design Rule.</p>
WEI Mingde Pg. 14-15	2/14/2017	D-0000598_HT-00001	<p>Q: WANG Yongming indicated to our staff today (the 14th) that "I can point out explicitly a number of ion implant (Implant) data that cannot be reverse engineered. The source of this data is what can't be reasonably explained by UMC's PI2 personnel. For example, In UMC's 32nm DRAM process topological layout rule, the "NSD.S1 Spacing and notch of N+implant over CAD_Array_Mark" in the "4A.15 N+Implant (NSD) Layer Out Rules", parameter is 0.32(um), are copies I made from Micron Company (DR25nmS). The F32-6F Array parameter 320 (nm) in "N+SD spacing (minimum)" of the (8-3) SD ion implantation (SD implantation) in the Temporary design rules Periphery Rev. 06 data; UMC Data "NSD.S1.1 Spacing and notch of N+IMPLANT except CAD_ARRAY_MARK" with parameter value of 0.42 (um) of "4A.15 N+IMPLANT (NSD) Layer Layout Rules" are copies I made from Micron Company (DR25nmS) "F32-6F Peri parameter 420 (nm) of "N+SD spacing (minimum)", the (8-3) SD ion implantation (SD implantation) in the Temporary design rules Periphery Rev. 06 document; embedded in the UMC data, the "DNW.W1 DEEP_N_WELL width" parameter 2.6 (um) of the "4A.5 DEEP_N_WELL(DNW) Layer Layout Rules", "DNW.S1 spacing and notch of DEW.W1 DEEP_N_WELL to DEW.W1 DEEP_N_WELL" parameter 2.9 (um), are copies I made from Micron Company (DR25nmS) in the Temporary design rules Periphery Rev. 06 document "13-4) DNwell: reversed" "DN well width(minimum)" parameter 2.6 (um) and "DN well spacing(minimum)" parameter 2900 (nm); UMC data "NW.W1 N_WELL width except CAD_ARRAY_MARK" Parameter 1 (um) of "4A.2N_WELL (NW) Layer Layout Rules", "NW.W1.1 N_WELL width over CAD_ARRAY_MARK" Parameter 0.6 (um), "NW.S1 Spacing and notch of N_WELL" parameter 1.1, are copies I made from Micron Company (DR25nmS) in the Temporary design rules Periphery Rev. 06 document, (13-1) Nwell: "reversed" "N well width [minimum] F32-6F Pen parameter 1000 (nm), F32-6F Array parameter 600 (nm) and "N well spacing (minimum)" parameter 1100 (nm); UMC data "PW.W1 N_WELL width" parameter 1.1 (um) of "4A.3 P_WELL (NW) Layer Layout Rules" parameter 1.1 (um), "NW.S1 Spacing and notch of P_WELL width over CAD_ARRAY_MARK" parameter 0.6 (um), "NW.S1.1 Spacing and notch of P_WELL width except CAD_ARRAY_MARK" parameter 1 (um), were copies I made from Micron Company (DR25nmS). In the Temporary design rules Periphery Rev. 06 document, the "P well width [minimum] parameter 1100 (nm) of the (13-2) Pwell In 'Forward', "N well spacing (minimum)" F32- 6F Peri Parameter 1000 (nm), F32-6F Array parameter 600 (nm) etc. Therefore, as long as the parameters are under UMC's implant layer layout rules, they are mostly referenced to Micron Company's data because these are data which UMC is unable to calculate through reverse engineering." Is that the case?</p> <p>A: What WANG Yongming described was true. We filled out the Layout Rule based on the information provided by WANG Yongming since UMC's 32nm Design Rule lacked ion implantation-related data values, so we requested WANG Yongming to provide it. There is possibility the related data information may be from the company he worked at; we did follow-up experiments on the data and the result proved that the data was feasible. Since I knew at the time that WANG Yongming had experience with DRAM, so I basically believed the information WANG Yongming provided to PI2 had credibility to some extent. I remember one day at an executive meeting when I reported the Design Rule production progress to RONG Letian that engineers encountered some difficulties and precision concerns when planning 32nm DRAM ion implantation numerical values using 65nm process logic. I forgot if RONG Letian had designated WANG Yongming to help, but later, RONG Letian gave me some information (around September of 2016, not sure of the exact date) and told me if I have questions, I can discuss them with WANG Yongming. The information RONG Letian gave me also included Micron's ion implantation data used by WANG Yongming which he described earlier today (14th) to your office. When I got this information, I turned it directly over for WU Guohao to handle. I also instructed WU Guohao to fill-in WANG Yongming's data directly in the initial draft of the design support manual for the 32nm DRAM Topological Layout Rule; basically, we have confidence in WANG Yongming's expertise in the DRAM process.</p>
WEI Mingde Pg. 15	2/14/2017	D-0000598_HT-00001	<p>Q: In its effort to conduct R&D of the 32nm DRAM, did UMC set up a related unit or designate a person in-charge specifically for ion-implantation?</p> <p>A: No, because PI2 has been on the lookout for someone with Design Rule or tape out [issue mask] background; so far none of the applicants have ion implantation expertise or related experience, so we are unable to appoint a person in charge of this part of the Design Rule.</p>
WEI Mingde Pg. 16	2/14/2017	D-0000598_HT-00001	<p>Q: WANG Yongming told our office today (14th) that "...RONG Letian, WEI Mingde and I stayed behind in the conference room after the morning meeting (the design rule being the discussion topic), RONG Letian asked me to provide Micron's related data and WEI Mingde was there, too..." You knew clearly that RONG Letian asked WANG Yongming to provide Micron's Design Rule related data to be used on UMC's 32nm DRAM Topological Layout Rule, why did you claim before that you did not know the related data information WANG Yongming provided is from Micron?</p> <p>A: I remember RONG Letian, WANG Yongming and I were there, I did indicate to RONG Letian my reservation about the precision of our Design Rule, but I don't recall how RONG Letian want to resolve it, and if he asked WANG Yongming to provide data from Micron. I only remember that a few days after this meeting, RONG Letian gave me the aforementioned handwritten Design Rule document asking me to discuss with WANG Yongming.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
WEI Mingde Pg. 18	2/14/2017	D-0000598_HT-00001	<p>Q: How did you obtained the Cell, Array or Periphery etc. data?</p> <p>A: When I joined PM2 in the end of June, 2016, UMC's 32nm Design Rule hasn't yet had the Cell, Array and Periphery parameters, but Cell, Array and Periphery data are data key to the DRAM process. RONG Letian gave me a hardcopy of related data on Cell, Array and Periphery parameter provided by WANG Yongming. He [RONG] told me that I could discuss it with WANG Yongming which I did regarding the Cell, Array and Periphery parameters.</p>
WEI Mingde Pg. 19	2/14/2017	D-0000598_HT-00001	<p>Q: Continued from above, were there any revisions made after you obtained the Cell, Array and Periphery parameter data provided by WANG Yongming?</p> <p>A: The entire PM2 Unit lacked the manpower and material resources to verify the Cell, Array and Periphery parameters, therefore I can only put trust in the data WANG Yongming provided without making changes to the related parameters.</p>
CHEN Shiyuan Pg. 1	1/29/2019	D-0000682_HT-00001	<p>Question: Where do you currently work? How long have you worked there?</p> <p>Answer: Fujian Jinhua Integrated Circuit Co., Ltd. (referred to below as Jinhua Co.), serving as department manager of the Diffusion Engineering Department, since starting in the position on February 7, 2017, under the Western calendar until the present; the Diffusion Engineering Department is a production unit in the factory, and the main job contents are being responsible for machine availability within the department, and carrying out repairs and maintenance for the machines</p>
CHEN Shiyuan Pg. 1	1/29/2019	D-0000682_HT-00001	<p>Question: Before you went to work at Jinhua Co., where were you working?</p> <p>Answer: Taiwan Micron Inc., I started in the position during the time of the predecessor to Taiwan Micron Inc., Rexchip Corp., and I left the position on January 3, 2017, under the Western calendar; my job title at Taiwan Micron Inc. was department manager of the Diffusion Engineering Department, and the job contents were also to be responsible for repairs and maintenance of machines in the department; in addition, at Taiwan Micron Inc., I also served as department manager for PIR and WET, and in these two departments, I also did equipment repairs and maintenance.</p>
CHEN Shiyuan Pg. 2	1/29/2019	D-0000682_HT-00001	<p>Question: By what channels did you take the position at Jinhua Co.?</p> <p>Answer: In August 2016 under the Western calendar, I started wanting to look for a job, because I wasn't happy working at Taiwan Micron Inc., at the time I had an operation and was in poor health, I recuperated for 1 or 2 months, and during that time, my supervisor at Taiwan Micron Inc. did not show any concern for me, so I started looking for a job; I inquired whether there were opportunities to apply for a position on the outside through many friends and manufacturers, and there happened to be someone who said to me that my previous boss CHEN Chengkun was getting ready to establish a factory on the Mainland, they told me to see whether I wanted to try it out, and they also helped me ask for the telephone number of CHEN Chengkun and his executive assistant KUO Peishan, so I made contact with them directly; KUO Peishan told me to send my resume to her, and KUO Peishan also helped me arrange an interview with CHEN Chengkun; in late 2016 I went to the Southern Taiwan Science Park of United Microelectronics Corporation to hold the interview, and during the interview, CHEN Chengkun certainly didn't make promises about my job, I just told CHEN Chengkun that if there's an opportunity, I can come over to help you, I don't care about a job. CHEN Chengkun also didn't mention my salary on taking a position at the new company, and during the interview it was just me and CHEN Chengkun present; later I again directly asked KUO Peishan, and she told me to wait for news, and after I left Micron Inc., around January 2017, KUO Peishan sent a letter of appointment at Jinhua Co. to me, and in the letter of appointment it was recorded that I would serve as department manager of the Diffusion Engineering Department at Jinhua Co..</p>
CHEN Shiyuan Pg. 2	1/29/2019	D-0000682_HT-00001	<p>Question: Before you went to take the position at Jinhua Co., apart from CHEN Chengkun, were you acquainted with other employees at Jinhua Co.?</p> <p>Answer: I was only acquainted with CHEN Chengkun and KUO Peishan.</p>
GUO Fengming/Ray Guo Pg.1	12/19/2018	D-0000714_HT-00001	<p>Q: What's your experience and current position?</p> <p>A: I retired from the military in 1999. In January of 2000, I entered Powerchip Technology Corporation (hereafter Powerchip Company), and served as equipment engineer in the 8-inch and 12-inch plant, respectively, under the Defect Analysis Department. Between 2004 to 2005, I was promoted as Section Chief of the 12-inch factory, Defect Analysis Department. In 2007, I was transferred to the Rexchip Electronics Corporation (hereafter, Rexchip Company) in Taichung and became Section Chief of the 12-inch factory Yield Analysis Section. In 2009, the Yield Analysis Section became the Yield Improvement Department, and I was promoted at the same time to be the department manager. In 2013, Rexchip merged with USA's Micron Technology Inc. (hereafter U.S. Micron), and Rexchip changed its name to Micron Memory Taiwan (hereafter Micron Taiwan). The Yield Improvement Department I was with also changed its name to RDA (Real-time Defect Analysis Department), where I continued as the department manager. I left Micron Taiwan in January, 2016, and joined United Microelectronics Corporation (UMC) thereafter's factory in Tainan in February. I remember my position title was project manager. At that time, UMC was planning to establish NBD (New Business Department), so it was recruiting employees for the future NBD. However, because NBD has yet to be established, I was not assigned a department or position when I first arrived at UMC, but was linked to the office of CHEN Zhengkun, the Senior Deputy Director. On a particular day that same month (February) after I started working at UMC, ZOU Shifang, a vice president at UMC, called for a DRAM development meeting of which attendees included myself, HE Jianling, and LI Fuzhe. It was then I found out our group was asked to develop DRAM. In the second quarter (Q2) of 2016, UMC officially established NBD – the New Business Department, and I officially became manager of NBD's PM2 DM until present.</p>
GUO Fengming/Ray Guo Pg.4	12/19/2018	D-0000714_HT-00001	<p>Q: How long have you worked at UMC?</p> <p>A: I started at UMC in February, 2016 until present (12/2018).</p>
GUO Fengming/Ray Guo Pg.4	12/19/2018	D-0000714_HT-00001	<p>Q: Where did you work before?</p> <p>A: I held positions at Powerchip and Rexchip before I started at UMC. In 2013, Rexchip was merged with Micron USA, and changed its name to Micron Memory Taiwan. I left Micron Memory Taiwan in January, 2016.</p>
GUO Fengming/Ray Guo Pg.6	12/19/2018	D-0000714_HT-00001	<p>Q: Continued from above, what department was CHEN Zhengkun in and position?</p> <p>A: At that time, CHEN Zhengkun was a senior Deputy General Manager at UMC's C&C OFFICE, but I'm not familiar with its actual name in Chinese.</p>
GUO Fengming/Ray Guo Pg.6	12/19/2018	D-0000714_HT-00001	<p>Q: What is the name of the department you are currently working at UMC?</p> <p>A: DM, short for Defect Analysis Management Department, situated in PM2, Technical Project Office No.2 of UMC's New Business Department – NBD.</p>
GUO Fengming/Ray Guo Pg. 9	12/19/2018	D-0000714_HT-00001	<p>Q: Please explain in detail the name and title of the management team from the Fujian Jinhua Company of China?</p> <p>A: I only know WU Kunrong is the Executive Deputy Director and Plant Manager of Fujian Jinhua Company of China, and CHEN Zhengkun is the current General Manager of Fujian Jinhua Company, China.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
GUO Fengming/Ray Guo Pg. 13	12/19/2018	D-0000714_HT-00001	<p>Q: When did UMC hand over the DRAM processing technology to Fujian Jinhua Company of the PRC?</p> <p>A: UMC first handed over the F32 DRAM processing technology that passed the test run stage to Fujian Jinhua Company of China this August and September (2018). In reality, though, UMC is still conducting R&D on the F32 DRAM, because the hardware (DEVICE) and the testing portions are yet to be completed.</p>
GUO Fengming/Ray Guo Pg. 13	12/19/2018	D-0000714_HT-00001	<p>Q: What was the DRAM process technology product that UMC handed over to Fujian Jinhua Company of China? Please Specify.</p> <p>A: The F32 DRAM processing technology.</p>
GUO Fengming/Ray Guo Pg. 6	4/22/2019	UMCD-0000149_HT-00001	<p>Question: (Remark: One copy of voice recording file and translation material from a UMC internal meeting during the investigation.) Does content of the recording and the translation match?</p> <p>Answer: (After listening and reading) Yes, the content of the recording and translation provided by your office are the same.</p>
GUO Fengming/Ray Guo Pg. 6	4/22/2019	UMCD-0000149_HT-00001	<p>Question: In reference to the above mentioned, who were the participants at this meeting? Were you one of them? Who are the persons respectively represented by codes C, K, L, and 11?</p> <p>Answer: This meeting was held after February 7 or 8 of 2016. Due to the time elapsed, I don't remember how many people were at the meeting. The code C represented a UMC attorney with the last name CHEN [STC 7115] (I don't know the given name); the code K was myself, and I have no idea whom code L represented. Code H was HUANG [STC 78061—the former director of legal affairs (I don't know the given name).</p>
GUO Fengming/Ray Guo Pg. 7	4/22/2019	UMCD-0000149_HT-00001	<p>Following the incident, Attorney CHEN and former Director of the Legal Affairs HUANG came to discuss this matter with me, I did try to FORMAT this computer I said in the recording that I wanted to turn this notebook computer over to the company ASAP is because it created a certain level of pressure and stress for me. Soon after this meeting, I turned this notebook computer over to our department secretary Jocky (I'm not sure of the Chinese name), but I don't know what Jocky did with this notebook computer.</p>
GUO Fengming/Ray Guo Pg. 8	4/22/2019	UMCD-0000149_HT-00001	<p>Answer: As I have stated previously, these two were back up notebook computers belonging to the First and Second Special Project Office of which everyone had access to. I'm not clear as to why one of them is kept by HE Jianing. The other computer, even though it was placed near my desk, it was available for everyone without having to first check with me or the department secretary. The people who knew about these two notebook computers, as far as I know, included HE Hauling, Li Fuzhe, and myself because we were the ones who entered UMC at an earlier stage. Additionally, the department secretary, Jocky, also knew about these two notebook computers. As to whether anyone else may have had knowledge of that, I'm not sure.</p>
GUO Fengming/Ray Guo Pg. 9	4/22/2019	UMCD-0000149_HT-00001	<p>Answer: After HE Jianing surrendered the notebook computer under his custody which was confiscated by the investigative unit, as I have mentioned, because I intuitively felt the notebook computer that was located next to my desk might cause misunderstanding, I did try to FORMAT the entire computer.</p> <p>Question: Where did you once hide the particular notebook computer?</p>
GUO Fengming/Ray Guo Pg. 10	4/22/2019	UMCD-0000149_HT-00001	<p>Answer: First of all, I need to explain that I did not hide this notebook computer. When your office came to conduct the search, this notebook computer was placed next to where I was sitting. After your office completed the search, I put the notebook computer inside my cabinet, making it under my custody instead of a shared computer.</p>
GUO Fengming/Ray Guo Pg. 11	4/22/2019	UMCD-0000149_HT-00001	<p>Answer: During the search at UMC, the notebook computer was placed by where I was sitting the whole time. After the search, I came to the conclusion that this computer may come under suspicion, so I wanted to return it to the company as soon as possible, which was why I put it inside my cabinet.</p>
GUO Fengming/Ray Guo Pg. 11	4/22/2019	UMCD-0000149_HT-00001	<p>Question: Who is "Jocky" you were referring to in that particular meeting? What is the person's Chinese name?</p> <p>Answer: Jocky's last name is CAO [STC 2580], female, a secretary to our Special Project Technical Office, but I forgot her full name.</p>
GUO Fengming/Ray Guo Pg. 11	4/22/2019	UMCD-0000149_HT-00001	<p>Question: What was Jocky's job responsibilities? Which department does she belong to?</p> <p>Answer: Jocky is a secretary of the Special Projects Technical Office to which I belong, and she is responsible for handling administrative and general matters.</p>
GUO Fengming/Ray Guo Pg. 2	4/22/2019	UMCD-0000183_HT-00001	<p>Question: In a voice recording file you heard today at the Taichung Investigation Office, and you have identified the voice recording file to be an internal investigation, when did it take place?</p> <p>Answer: The location was a meeting room at UMC's Nanke plant, and it was conducted after the search by inspection/investigative personnel at the Nanke plant, but I forgot the exact date, but it should be after February 7, 2016.</p>
GUO Fengming/Ray Guo Pg. 2	4/22/2019	UMCD-0000183_HT-00001	<p>Question: Who do you remember participated in the internal investigation?</p> <p>Answer: There were four of us, HUANG [STC 7806], former director of Legal Affairs; Attorney CHEN [STC 7115], an UMC employed attorney; a third person who I'm not familiar with, and myself.</p>
LO Hero Pg. 1	1/29/2019	D-0000752_HT-00001	<p>Question: Where do you currently work? How long have you worked there?</p> <p>Answer: I work at Fujian Jinhua Integrated Circuit Co., Ltd. (referred to below as Jinhua Co.), I started working at that company in November 2016 under the Western calendar.</p>
LO Hero Pg. 1	1/29/2019	D-0000752_HT-00001	<p>Question: Before you went to work at Jinhua Co., where did you work?</p> <p>Answer: Taiwan Micron Inc.</p>
LO Hero Pg. 2	1/29/2019	D-0000752_HT-00001	<p>Question: Why did you leave Taiwan Micron Inc.? How long did you work at the former company?</p> <p>Answer: I held a position at the predecessor company to Taiwan Micron Inc., Rexchip Electronics Corporation, from August 2013 under the Western calendar until retiring from Taiwan Micron Inc. in October 2016.</p>
LO Hero Pg. 2	1/29/2019	D-0000752_HT-00001	<p>Question: What was your job title at the former company? What were the contents of your work at the former company?</p> <p>Answer: My job title at Taiwan Micron Inc. was Head of the Manufacturing Division. I was responsible for management of the production line operators, as well as the factory's chip input and output, personnel training and recruitment, and production management.</p>
LO Hero Pg. 2	1/29/2019	D-0000752_HT-00001	<p>Question: You mentioned a moment ago that you took a position at Jinhua Co. in November 2016, by what means did you come to work at Jinhua Co.?</p> <p>Answer: Because I had retired from Taiwan Micron Inc., after retiring, I wanted to look for a job, and CHEN Chengkun had previously been my superior at Taiwan Micron Inc., so I took the initiative to seek him out to see whether there were job opportunities, before I retired I knew that CHEN Chengkun was working at the Southern Taiwan Science Park of United Microelectronics Corporation, serving as the Vice President.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
LO Hero Pg. 2	1/29/2019	D-0000752_HT-00001	<p>Question: Please explain whether you had received an interview before taking the position at Jinhua Co.? If so, when was the interview? Who interviewed you (please say this person's name and their job title)? Was it CHEN Chengkun who interviewed you? Was it WU Kun who interviewed you? Where did the interview take place? In applying for an interview at this new company, what was the job title? During the interview, how did the interviewer introduce your job position? Who provided you with the job package or employment package (employment package)?</p> <p>Answer: There was, my impression is that I first used line to contact KUO Peishan, I sent my resume materials to KUO Peishan through line, and asked her to hand over my resume to CHEN Chengkun to look at it, later KUO Peishan made contact with me to go to the Southern Taiwan Science Park of United Microelectronics Corporation for an interview, around the time of September 2016 I went to the Southern Taiwan Science Park of United Microelectronics Corporation for an interview with CHEN Chengkun, the discussions were in the interview area within United Microelectronics Corporation, and at the time, the people present included myself, KUO Peishan, and CHEN Chengkun. At the time I hoped to serve as the supervisor of the Manufacturing Department, which was similar to my work at Taiwan Micron Inc. CHEN Chengkun said to me, Jinhua Co. is in Fujian Province, during the interview he didn't very clearly explain how much the salary was, during the interview I knew that I could go to Jinhua Co. to serve as the supervisor of the Manufacturing Division, but the formal offer wasn't signed until I got to Jinhua Co..</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: Before your interview with CHEN Chengkun, had you heard of Jinhua Co.?</p> <p>Answer: I had learned about it from a newspaper or magazine.</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: Before you accepted the new job, were you acquainted with the people at Jinhua Co.?</p> <p>Answer: No</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: After you took the position at Jinhua Co., what was the name of the department you belonged to?</p> <p>Answer: The department I belonged to was the Manufacturing Technology Division, I served in the position of Director.</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: Please explain what the management organization at Jinhua Co. is? And the reporting level above you. Say the name of the manager for each reporting level above you?</p> <p>Answer: Above the Manufacturing Technology Division, there is a Deputy Chief Operating Officer, WU Kunrong, he is my direct superior, and below the Deputy Chief Operating Officer, mainly three units have been established, which are the Process Technology Division (the director is YING Tsunghua, of Taiwanese nationality), the Process Integration Department (the director is CHEN Huihuang, of Taiwanese nationality), and the Manufacturing Technology Division; that is to say, these three units are all supervised by people of Taiwanese nationality.</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: How many people are members of the Manufacturing Technology Division at Jinhua Co., to which you belong?</p> <p>Answer: In total there are 260 people, including the operators, and 4 departments have been established below the Manufacturing Technology Division, which are respectively the Manufacturing Department, Production Control Department, Manufacturing Systems Department, and Industrial Engineering Department.</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: The supervisors of the Manufacturing Department, Production Control Department, Manufacturing Systems Department, and Industrial Engineering Department are of Taiwanese nationality or Mainland nationality?</p> <p>Answer: Currently they are all of Taiwanese nationality</p>
LO Hero Pg. 3	1/29/2019	D-0000752_HT-00001	<p>Question: The names of those serving as supervisors of the 4 departments?</p> <p>Answer: The supervisor of the Manufacturing Department is HSU Tunhao, the supervisor of the Production Control Department is SU Chienyu, the supervisor of the Manufacturing Systems Department is PAN Chengsung, and the supervisor of the Industrial Engineering Department is LI Chinyu.</p>
LO Hero Pg. 4	1/29/2019	D-0000752_HT-00001	<p>Question: Address of the headquarters of Jinhua Co.?</p> <p>Answer: The headquarters are at No. 88 Lianhua Avenue, Integrated Circuit Science Park, Jinjiang City, Fujian Province, and Jinhua Co. doesn't have other branch companies.</p>
LO Hero Pg. 4	1/29/2019	D-0000752_HT-00001	<p>Question: Which people contributed capital to Jinhua Co.?</p> <p>Answer: I only know that, among the big financers, there was the Jinjiang Municipal Government in Fujian Province, as well as the Fujian Electronics and Information Group.</p>
LO Hero Pg. 4	1/29/2019	D-0000752_HT-00001	<p>Question: Which individuals are the responsible personnel at Jinhua Co.?</p> <p>Answer: The board chair is a person of Mainland nationality, LU Wensheng.</p>
LO Hero Pg. 4	1/29/2019	D-0000752_HT-00001	<p>Question: Under the board chair of Jinhua Co., has a president been installed?</p> <p>Answer: Yes, one president, that's CHEN Chengkun, and below the president there are the vice presidents, in total there are 4 or 5 vice presidents.</p>
LI Fuzhe Pg 2	12/19/2018	D-00007774_HT-00001	<p>Q: Your experience? Present occupation?</p> <p>A: I was discharged from the military in 2002. I went to work for the Powerchip Technology Corporation [hereafter Powerchip] and Taichung's Rexchip Electronics Corporation [hereafter Rexchip]. In 2013, Rexchip was merged with another company, and renamed Micron Memory Taiwan [hereafter Micron], located in Taichung. I was the Etching Engineering Department manager, Reigen Dept E manager, and so on. I left the post at the end of 2015, and after two weeks, took a job as senior manager at the United Microelectronics Corporation [hereafter UMC]'s C&C Office. In April, 2016, UMC established NBD (I am not familiar with Chinese name), and I was transferred there as the deputy section head of the Etching Engineering Section to present.</p>
LI Fuzhe Pg 2	12/19/2018	D-00007774_HT-00001	<p>Q: How long have you been working for UMC?</p> <p>A: I entered UMC as senior manager of the C & C Office on 11/19/2015. UMC established NBD in April of 2016, and I was transferred to the Etching Engineering Section under NBD as deputy head of the section to present.</p>
LI Fuzhe Pg 2	12/19/2018	D-00007774_HT-00001	<p>Q: Where have you been working before?</p> <p>A: I was discharged from the military in 2002. I worked at Powerchip and Taichung's Rexchip. In 2013, Rexchip was merged with another company, and renamed Micron Memory Taiwan.</p>
LI Fuzhe Pg 3	12/19/2018	D-00007774_HT-00001	<p>Q: When were you hired by UMC?</p> <p>A: I entered UMC as senior manager of C&C Office on November 19, 2015. In April, 2016, UMC established NBD, and I was transferred and continued to be deputy head of the Etching Engineering Section under NBD.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
Li Fuzhe Pg 3	12/19/2018	D-00007774_HT-00001	<p>Q: How were you hired by UMC?</p> <p>A: Since I didn't want to do outsource work and I was not happy working at Micron in Taichung, I submitted my resignation in January, 2015 to the then General Manager CHEN Zhengkun of Micron in Taichung. At that time I already got a job offer from Winbond Electronics. However, CHEN Zhengkun asked me to stay, that was why I didn't report to work at Winbond. Because I told CHEN Zhengkun that I was under a lot of pressure at the Etching Engineering Department leading 200 engineers, CHEN Zhengkun tried hard to keep me, and transferred me to be manager at Reigen Dept E. To my surprise, CHEN Zhengkun left Taichung Micron in September, 2015, and I learned later that CHEN Zhengkun accepted a post at UMC. My thought was that CHEN Zhengkun felt he had a moral obligation to help me leave Micron in Taichung. CHEN Zhengkun did tell me the business nature of UMC is different from that of Micron, and asked if I was willing to accept a new challenge. Furthermore, because the job classification and nature of the job is different at UMC than Micron, therefore UMC may not completely accepted the salary and seniority aspects, so CHEN asked whether it was acceptable for me. At that time I expressed that so long as I was getting out of Micron of Taichung that would be alright. Later on CHEN Zhengkun asked UMC's Human Resources Department to talk with me about the job details, that was when I learned UMC's salary was only be 70 percent of my Micron salary. After the talk, I submitted my resignation to Micron at the beginning of October 2015, and left at the end of October. On November 19 of that same year, I began working for UMC. Additionally, I must point out that, although I'm a native of Tainan, I settled in Taichung when I got my job at Rexchip. By accepting the UMC job, I had to move to Tainan, which was not a very good choice. However, it was the best choice so long as I could leave Micron in Taichung, even though the salary is lower at UMC, and it's located in Tainan, for me it was still a pretty good choice.</p>
Li Fuzhe Pg 4	12/19/2018	D-00007774_HT-00001	<p>Q: Were you referred to UMC through one of its current employee?</p> <p>A: No. After CHEN Zhengkun left Micron of Taichung, I asked CHEN Zhengkun several times whether a suitable post was available. At first CHEN Zhengkun told me there was no hurry, and advised me to stay put at Micron. A while later, in September, 2015, I heard CHEN Zhengkun entered UMC. In October, 2015, I asked CHEN Zhengkun again whether there was a suitable job opportunity, it was then CHEN Zhengkun asked if I wanted to work for UMC, because the work is located at Nanke [Tainan Science Park]. CHEN Zhengkun asked whether I can take care of my family in Taichung. After discussing the issue with my wife, I decided to make my move to work for UMC.</p>
Li Fuzhe Pg 6	12/19/2018	D-00007774_HT-00001	<p>Q: What kind of job do you currently hold?</p> <p>A: I am deputy department head of the Etching Engineering Department under NBD.</p>
Li Fuzhe Pg 6	12/19/2018	D-00007774_HT-00001	<p>Q: Please describe in detail of what your job responsibility entails?</p> <p>A: My responsibilities at NBD's Etching Engineering Department include monitoring engineerings to see if their tasks are completed on time according to the established plan and schedule. My supervisor is YANG Jianrong. I have 4 groups under me, managing approximately 42 engineers.</p>
Li Fuzhe Pg 8	12/19/2018	D-00007774_HT-00001	<p>Q: Please provide in detail the names and job titles of the management team of Fujian Jinghua Company.</p> <p>A: I only know CHEN Zhengkun is the General Manager, and WU Kunrong is the Deputy General Manager of Fujian Jinghua Company, I don't know the rest.</p>
Li Fuzhe Pg 13	12/19/2018	D-00007774_HT-00001	<p>Q: How many UMC laptop computers are there that contain Micron's documents folders?</p> <p>A: At Micron, HE Jianting and I had a habit of using USB drives while at work. HE Jianting and I entered UMC on November 5 and November 19, respectively. Because UMC bans the use of USB drives and adopts a rigorous observation of departments notes [NOTES], when HE Jianting and I entered UMC, we were assigned to the C&C OFFICE just below the CEO OFFICE, but we were not able to access other departments' data through the computer system. For that reason, HE Jianting and I submitted to CHEN Zhengkun an application use USB drives, and UMC assigned us two network-disabled laptop computers for us to read our own USB drives.</p>
Li Fuzhe Pg 14	12/19/2018	D-00007774_HT-00001	<p>Q: As stated above, did you own a laptop computer at UMC that contained Micron's documents folders?</p> <p>A: I had a network-disabled but USB-enabled laptop computer. As for the previously stated USB-enabled laptop that I applied for when I entered UMC, although I was using it, but it was not a property registered under my name. After I received the legal attest letter from Micron in April, 2016, I tossed away my USB drive to avoid getting into trouble, since then I have not used that computer. I placed that computer on a small table next to my desk at my office On the day when your honorable department's personnel came to conduct the search at UMC, I was away at a meeting at another fab. On my way back to the office, I heard WANG Yangming was searched. A few days later, the company turned in a lot of HE Jianting's material, including a USB enabled laptop computer. It was then I remembered I also have a laptop computer with the same functionalities that can read USB drives, that was when I turned around to look for this computer. I discovered it was no longer there, and it has not turned up since.</p>
Li Fuzhe Pg 14	12/19/2018	D-00007774_HT-00001	<p>Q: Who was the person who issued the particular laptop computer for your utilization?</p> <p>A: After CHEN Zhengkun agreed verbally to my request for the need of a [laptop], I made the proposal to apply through HUANG Wanjun, the secretary. After a couple of days, Secretary HUANG Wanjun and personnel from IT brought the computer to me for utilization. HUANG Wanjun was the secretary assigned by the HR Department to assist HE Jianting and myself.</p>
Li Fuzhe Pg 15	12/19/2018	D-00007774_HT-00001	<p>Q: Why was you assigned the particular laptop computer?</p> <p>A: As I stated above, I would not have been able to complete the work assigned to me by CHEN Zhengkun without the collaborative vendor data stored on the USB drive.</p>
Li Fuzhe Pg 15	12/19/2018	D-00007774_HT-00001	<p>Q: Do these laptop computers carried special functions? Therefore they were differ from the ones assigned to most of the other UMC employees?</p> <p>A: The model of that laptop computer was very old, with no WiFi function and no network cable connector, it can only be used as a card reader. Generally speaking, UMC employees have ULTRA BOOK laptops with WiFi function and network cable connector, they also work better</p>
Li Fuzhe Pg 17	12/19/2018	D-00007774_HT-00001	<p>Q: When did UMC make its delivery of the DRAM technical process to Mainland China's Fujian Jinghua Company?</p> <p>A: Approximately July to August, 2018, UMC submitted documents of the DRAM technical process to the Fujian Jinghua Company of Mainland China.</p>
Li Fuzhe Pg 17	12/19/2018	D-00007774_HT-00001	<p>Q: How did you come to know that the DRAM technical process was delivered to Fujian Jinghua Company of China?</p> <p>A: This was because related documents have to be prepared by each department for submission to the technology transfer department, that's how I came to know UMC has submitted the DRAM technical process to the Fujian Jinghua Company of Mainland China. However, I don't have details on the date.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
LI Fuzhe Pg 18	12/19/2018	D-0000774-HT-00001	<p>Q: Did Fujian Jinghua Company of China's personnel attended work meetings at UMC? What are the names and job titles of the attendees?</p> <p>A: Fujian Jinghua Company did sent personnel to UMC to learn about the DRAM process technology at relevant meetings. UMC arranged them to sit in an office for vendors. At our WEEKLY meetings, we would allow Fujian Jinghua Company's personnel to listen in through the telephone, but I don't know the names of those who listened in. In the DRAM process related meetings I attended, I have not heard anyone speaking out from Fujian Jinghua Company.</p>
LI Fuzhe Pg 3	12/19/2018	D-0000790-HT-00001	<p>Q: However, in a question posted by the investigation officer earlier today, you stated you had tossed away an USB you used previously at Micron?</p> <p>A: Yes, that was because I used to work at Micron. Micron at that time allowed the use of portable disks, which was why I used the particular portable disk to store the work I had to take care of from the company. When I go out on business trips, I would sometimes store files to take them out. Due to the fact that I have a habit of not distinguishing personal and company files on the portable disk, I also carried this portable disk with me when I left to work for UMC on November 19, 2015. Shortly after reporting to work at UMC, I applied for a non-Internet connected laptop from UMC which came with a UBS [sic] port. HUANG Wanjun, the secretary at the time, helped us with the application. I don't know what the applicant's name was that HUANG Wanjun put down on the form. I remember getting a very thick computer labeled with a UMC computer serial number, but I forgot the serial number. I did use the portable disk using the port from that laptop.</p>
LI Fuzhe Pg 4	12/19/2018	D-0000790-HT-00001	<p>I had to refer to the suppliers' information for Micron in order to hold discussions with internal people at UMC, to find out the differences in the machines I used at Micron and the ones used at UMC. We must find out their differences in order to improve performance.</p>
LI Fuzhe Pg 5	12/19/2018	D-0000790-HT-00001	<p>Q: What is behind the F325 Nano technology?</p> <p>A: S refers to shrink, which is the size for manufacturing of the smallest unit that must be smaller than 32nano.</p>
LI Fuzhe Pg 5	12/19/2018	D-0000790-HT-00001	<p>Q: Did you open a bank account in Mainland China?</p> <p>A: Yes, because the salary we received from UMC was too low. Later on when UMC confirmed it was going to engage in DRAM, I suspect UMC's upper management wanted to compensate the difference in salary we had from Micron (because the work we do at UMC is the same as at our previous company), but in the beginning UMC's salary and fringe benefits accounted for only 70% to that of Micron, that was why Jinhua Company paid our salary through an account we opened in Mainland China.</p>
LI Fuzhe Pg 6	12/19/2018	D-0000790-HT-00001	<p>according to a signed contract between Jinhua and UMC, I am considered a consultant for Jinhua Company.</p> <p>Q: When did Jinhua start to wire money into your Mainland China bank account?</p>
LI Fuzhe Pg 6	12/19/2018	D-0000790-HT-00001	<p>A: I remember vaguely it started around February of 2017, the monthly amount wired was converted to approximately 140,000 to 150,000 NTD.</p>
LI Fuzhe Pg 8	12/19/2018	D-0000790-HT-00001	<p>Q: Are you aware there were two laptop computers approved by CHEN Zhengkun, each of which contained an usb port for the company's utilization?</p> <p>A: I am aware there were two computers.</p>
LI Fuzhe Pg 8	12/19/2018	D-0000790-HT-00001	<p>Q: However, according to the prosecutor's earlier finding, WANG Yongming had used the laptop which HE Jianting was the applicant?</p> <p>A: I have no idea why WANG Yongming would have used the laptop applied by HE Jianting. At the time when I submitted the laptop application, HE Jianting also applied. I was the one who told CHEN Zhengkun I had a need to utilize a portable usb, because CHEN Zhengkun assigned me with some tasks.</p>
LI Fuzhe Pg 8	12/19/2018	D-0000790-HT-00001	<p>Q: Has CHEN Zhengkun ever used the laptop applied by either you or HE Jianting?</p> <p>A: I cannot be certain, I wasn't administering the laptop I applied.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000806-HT-00001	<p>Question: What's your experience and current position?</p> <p>Answer: After being discharged from the military, I went abroad to study in the US. I returned [to Taiwan] in 1997, and became a financial analyst for the Ford Motor Company. I joined Maxedge Electronics Corp. as a financial analyst in 1999, and was later promoted as finance manager. In 2003, I worked for the Powerchip Technology Corp. Ltd. (hereafter: Powerchip) as a finance manager. In 2006, Powerchip and Elpida Memory, Inc. (hereafter: Elpida) of Japan merged to become Rexchip Electronics Corporation (hereafter: Rexchip), and I transferred to Rexchip in 2007 as the company's Director of Finance. In 2013, Rexchip was acquired by Micron Technology Inc. (hereafter: Micron USA), with a change in name to Micron Memory Taiwan (hereafter: Micron Company), and I became the finance accounting manager for the company. In February, 2017 following my retirement from the Micron Company, I became a consultant for the United Microelectronics Corporation (hereafter: UMC) in June, 2017. When my one year contract ended in June, 2018, I became a consultant for the Mainland China's Fujian Jinhua Integrated Circuit, Co. Ltd (hereafter: Jinhua Company) until present.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000806-HT-00001	<p>Question: Pertaining to the above, what were you responsible for as a consultant at UMC?</p> <p>Answer: When I was a consultant at UMC, I'd need to work at the office only three days a week, on the average. Due to a technology development agreement between UMC and the Jinhua Company, my main task was to support Jinhua Company's financial personnel by teaching them how to prepare financial forecasts and budgets. The financial forecast portion included production of the income statement, the balance sheet and the cash flow statement, in addition to cost analysis.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000806-HT-00001	<p>Question: Pertaining to the above, what were you responsible for as a consultant for the Jinhua Company?</p> <p>Answer: The reason why I changed to become a consultant for Jinhua instead of UMC was that, after my one-year contract was up with UMC, I wanted to take a break. After the break, I had a discussion with CHEN Zhengkun, who was the Deputy General Manager at UMC and General Manager at Jinhua. CHEN Zhengkun indicated since my job was teaching Jinhua financial personnel on how to prepare financial forecasts and budgets, he therefore asked me to become a consultant for the Jinhua Company. I accepted the offer because the nature of the job is the same as that of UMC.</p>
QUE Liangwu Pg 3	12/19/2018	D-0000806-HT-00001	<p>Question: How long have you worked at your current company?</p> <p>Answer: I became a consultant for the Jinhua Company on September 10, 2018, about three months to date.</p>
QUE Liangwu Pg 3	12/19/2018	D-0000806-HT-00001	<p>Question: Why did you leave Micron?</p> <p>Answer: Upon my entry at Powerchip, the company already had in place a so called "Excellent Retirement Plan", which was as long as your age and years of service combined to equal 60 years or more, you are qualified to apply for retirement. I qualified at the end of 2016, so I chose to retire from the Micron Company in February, 2017.</p>

Name of interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
QUE Liangwu Pg 3	12/19/2018	D-0000806_HT-00001	<p>Question: How were you hired by the Jinhua Company?</p> <p>Answer: As I mentioned, I started working as a financial consultant for UMC in June, 2017. After my one-year contract has ended, I expressed to UMC General Manager CHEN Zhengkun about my wish to take a break. In September, 2018, I told CHEN Zhengkun that I was able to return to work. CHEN Zhengkun reasoned since my main responsibility was to assist the Jinhua Company which was in partnership with UMC to do financial forecasts and budgets, and since CHEN Zhengkun was also Jinhua's General Manager, so CHEN expressed his wish for me to work directly for the Jinhua Company as a financial consultant.</p>
QUE Liangwu Pg 4	12/19/2018	D-0000806_HT-00001	<p>Question: Who introduced you to work for UMC?</p> <p>Answer: After I retired from Micron in February, 2017, I was getting bored, so I spoke to Micron's former General Manager CHEN Zhengkun, to see if there was a full time position for me. At that time, CHEN Zhengkun was UMC's Deputy Manager, so he referred me to UMC and I became a financial consultant for the company.</p>
QUE Liangwu Pg 4	12/19/2018	D-0000806_HT-00001	<p>Question: Who introduce you to work for the Jinhua Company?</p> <p>Answer: As I have stated, CHEN Zhengkun was the person who asked me to transfer from UMC to the Jinhua Company as a Financial Consultant, so CHEN Zhengkun can be considered as my referral for the Jinhua Company.</p>
QUE Liangwu Pg 4	12/19/2018	D-0000806_HT-00001	<p>Question: Continued from above, were you interviewed for your position as a financial consultant for the Jinhua Company? What was the interviewer's name and position?</p> <p>Answer: There was no interview, I was also directly notified to report to work by Jinhua Company's Human Resources Department.</p>
QUE Liangwu Pg 5	12/19/2018	D-0000806_HT-00001	<p>Question: Who spoke to you with the employment offer at the Jinhua Company?</p> <p>Answer: GUO Peishan (I'm not sure if GUO Peishan was from Jinhua Company's HR or UMC's HR) also gave me an employment contract listing the compensation, workhours, confidential provisions, etc., again, none of which I was involved in negotiating. The only thing I expressed to CHEN Zhengkun was that I was able to work only two days per week at Jinhua.</p>
QUE Liangwu Pg 5	12/19/2018	D-0000806_HT-00001	<p>Question: Please describe in details your work responsibility at UMC?</p> <p>Answer: Due to a R&D technology agreement between UMC and the Jinhua Company, I was mainly responsible for assisting the Jinhua financial personnel. I would teach them how to formulate and produce financial forecasts and budgets. Financial forecasts include production of the balance sheet, income statement, cash flow statement, and expense analysis.</p>
QUE Liangwu Pg 6	12/19/2018	D-0000806_HT-00001	<p>Question: Please describe in details your job responsibilities at the Jinhua Company?</p> <p>Answer: My main responsibility is to assist Jinhua's financial personnel by teaching them how to formulate/produce financial forecasts and budgets. The financial forecasts portion includes the balance sheet, the income statement, the cash flow statement, as well as expense analysis.</p>
QUE Liangwu Pg 8	12/19/2018	D-0000806_HT-00001	<p>Question: What do you know about the technical cooperation agreement between UMC and Mainland China's Fujian Jinhua Company?</p> <p>Answer: I just remember seeing in the contract that Jinhua Company is paying UMC a total of 400 million USD to conduct R&D on the DRAM technology, which included two generations of the technology; payment is made by installments according to the stage of completion.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000816_HT-00001	<p>Question: When did you become a financial consultant at the Fujian Jinhua Company?</p> <p>Answer: I started in September of this year. I was a financial consultant at UMC from June, 2017, but it is a year to year term. I took about three months off when my one year term ended this June. In September, I called CHEN Zhengkun and told him I would be able to work again; I asked if he can refer me a job, which was when CHEN Zhengkun said I can work for the Jinhua Company.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000816_HT-00001	<p>Question: Did you go through an interview process before working at Jinhua?</p> <p>Answer: No. As a financial consultant at UMC, I knew CHEN Zhengkun was UMC's Deputy General Manager and Jinhua Company's General Manager, so when he said I'm able to work for the Jinhua Company, to me that means a go.</p>
QUE Liangwu Pg 2	12/19/2018	D-0000816_HT-00001	<p>Question: Where was your work location after becoming a Jinhua Company financial consultant?</p> <p>Answer: Inside UMC's plant in Tainan Science Park where there is an office, my office is on the second floor. As far as I know, CHEN Zhengkun and I were the only ones from Jinhua Company working on the second floor office. There is a conference room on the first floor setup especially for Jinhua employees. I have never worked at the Jinhua Company site in Mainland China, but I have been there on business trip[s]. As for my salary, it is deposited by the Jinhua Company to my account in Mainland China.</p>
QUE Liangwu Pg 5	12/19/2018	D-0000816_HT-00001	<p>Question: As far as your impression is concerned, what kind of target did the Jinhua Company set in terms of quantity for initial phase wafer production?</p> <p>Answer: According to Jinhua Company's budget, the target is set for 20,000 wafers by the latter half of next year.</p>
QUE Liangwu Pg 7	12/19/2018	D-0000816_HT-00001	<p>Question: Is CHEN Zhengkun working at the Jinhua Company?</p> <p>Answer: To my knowledge, following the episode when the US Department of Justice announced in a press conference that it would indict certain people at UMC, CHEN Zhengkun and I were asked by UMC to leave its Tainan's Science Park office, so CHEN should no longer be working at UMC. At this time, CHEN Zhengkun should still be working at the Jinhua Company, traveling between Taiwan and the PRC.</p>
QUE Liangwu Pg 7	12/19/2018	D-0000816_HT-00001	<p>Question: Do you still work every day at UMC's Tainan Office?</p> <p>Answer: There is no longer a need for me to go to UMC at this time, although I'm still a financial consultant for the Jinhua Company, I don't have a place to work. I would communicate with Jinhua from home using my e-mail at lawrencechueh@gmail.com. In reality, after the US press conference, Jinhua no longer sends its budget information to me, even though it still paid my salary from last month. My thinking is that Jinhua would continue employing me until the end of this year.</p>
WANG Bangming Pg 2	12/19/2018	D-0000875_HT-00001	<p>Question: What is your experience and current occupation?</p> <p>Answer: I worked as an Automation Engineer for the Digital Equipment Corporation, then for six to seven years after that, a professional Information Technology (IT) Consultant at HP Technology Co., Ltd. [hereafter HP]. I entered United Microelectronics Corporation [UMC thereafter] between 1996 to 1997, and worked there ever since. The positions I held at UMC were entirely in the Information Technology or Information Security departments. I was a manager, division director, senior division director, and promoted as an Associate in 2018.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
WANG Bangming Pg 2	12/19/2018	D-0000875_HT-00001	<p>Question: When were you hired by your current company?</p> <p>Answer: I was hired by UMC between 1996, 1997.</p>
WANG Bangming Pg 2	12/19/2018	D-0000875_HT-00001	<p>Question: How were you hired by UMC?</p> <p>Answer: It was sometime between 1996 and 1997, UMC wanted to build an 8-inch wafer plant, and was looking for a CIM (Computer Integrated Manufacturing System) manager; I was a PSO (Professional Service Operations) manager at HP at the time, responsible for manufacturing of the computer integrated manufacturing system, so UMC invited me to join the company. UMC's Information Engineering Division (IT) [IT thereafter] includes three major departments, MIS (Information System Management), Information Structure Service (including networks, communications and servers) and CIM. The IT Division is overseen by one division director, three deputy division directors, and several managers. I started out working as a CIM Department Manager at the 8-inch plant's No. 5 Factory, then promoted to Deputy Division Director of the CIM Department, followed by Division Director, then Senior Division Director of the IT Division (due to professional level adjustment). When UMC established its Information Security Division in 2017 (including information security and security maintenance of the factory area), I was acting simultaneously as Director of the IT Division and as Director of the Information Security Division. In 2018, when the Information Security Division changed its name to the Enterprise Security Division (including information security and maintenance of factory safety), I was promoted as an Associate, and remains as manager of the Enterprise Security Division and the IT Division at the highest level.</p>
WANG Bangming Pg 3	12/19/2018	D-0000875_HT-00001	<p>Question: What is the name of the department you belong to at the company?</p> <p>Answer: I hold the highest managerial position of the Enterprise Security Division and the IT Division, referred to currently as Associate. The Enterprise Security Division and the IT Division are Level-1 departments at UMC.</p>
WANG Bangming Pg 3	12/19/2018	D-0000875_HT-00001	<p>Question: Please describe in detail your professional responsibilities.</p> <p>Answer: The IT Division is responsible for services involving hardware and software, system development and software development. The Information Structure Service Department, originally under the IT Division, is responsible for UMC's information security; it was upgraded to the Information Security Division in 2017, and became a Level-1 independent unit responsible for three major tasks: anti-virus, anti-hacking and anti-leaking (information leaking). In 2018, UMC again merged Information Security and Physical Security into one unit, and renamed it the Enterprise Security Division. As Associate of the Enterprise Security Division and the IT Division, I am responsible for everything that goes on in these two divisions, big or small.</p>
WANG Bangming Pg 4	12/19/2018	D-0000875_HT-00001	<p>Question: Please describe in detail the name/position of colleagues who are under the same IT Division?</p> <p>Answer: There are three major departments under the IT Division: MIS (Management Information System), Information Structure Service (including networks, communications and servers) and CIM. CIM is managed by two deputy division directors, ZHUANG Yuming (responsible for information engineering at the 12-inch Wafer Factory) and CHEN Yiyi (responsible information engineer at the 8-inch Wafer Factory IT and also Deputy Division Director of the Enterprise Security Division), whereas the other two departments are under my direct management. The Business Services (BS) Department under MIS (Management Information Systems) has one Level-2 supervisor - Deputy Division Director CHEN Qihong. The Information Structure Services Department has under it two departments: the Enterprise Document Center (EDC) and the Enterprise Infrastructure Center (IIS). The Centers are managed respectively by two Level-2 supervisors, Deputy Division Director XIAO Weilong and Deputy Division Director ZHOU Xinhong. UMC has six 8-inch wafer factories and two 12-inch wafer factories (one in Tainan and one in Singapore). CIM of the IT Division is responsible for anything IT related. The 8-inch Wafer Factory's AB Factory and E Factory are managed by a Level-2 supervisor, CHEN Yiren. The 8-inch Wafer Factory's C Factory and S Factory are managed by a Level-2 supervisor, Deputy Division Director ZHENG Rukai. The 8-inch Wafer Factory's D Factory and F Factory are managed by a Level-2 supervisor, Deputy Division Director LIN Kaiji. In Tainan's 12-inch Wafer Factory, Deputy Division Director FAN Huilin, a Level-2 supervisor, is responsible for the CIM12A (manufacturing implementation system); Deputy Division Director LI Enwei is responsible for the CIM12A_2 (production information system); Deputy Division Director LU Jian is responsible for the automation system, and Deputy Division Director XIAO Weilong is responsible for the MIS12A (hardware, network). The CIM12I (production information, production implementation and the automation system) in Singapore's 12-inch Wafer Factory is managed by a Level2 supervisor, Deputy Division Director XIAN Hongchang; the MIS12I (hardware, network) is managed by a Level-2 supervisor, Manager YANG Ruidie. In addition, the CIM Department has a Project Management Department (specializes in the development of shared systems), managed by a Level-2 supervisor, Deputy Division Director ZHANG Renkuan.</p>
WANG Bangming Pg 5	12/19/2018	D-0000875_HT-00001	<p>Question: Where are the respective locations of the 8-inch Wafer Factory's AB Factory, E Factory, C Factory, S Factory, D Factory and F Factory?</p> <p>Answer: The locations of the UMC's 8-inch Wafer Factory's AB Factory, E Factory, C Factory, S Factory, D Factory and F Factory are all at the Hsinchu Science Park in the City of Hsinchu.</p>
WANG Bangming Pg 6	12/19/2018	D-0000875_HT-00001	<p>Question: Do you know the Fujian Jinhua Company of Mainland China? What do you know about it?</p> <p>Answer: I know about the Fujian Jinhua Company. As far as I know, Fujian Jinhua and UMC have technical cooperations with each other; to my knowledge is wafer production technology, factory development consulting services, etc., they have cooperations with each other.</p>
WANG Bangming Pg 6	12/19/2018	D-0000875_HT-00001	<p>Question: During your employment with UMC, have you ever cooperated with anyone from Fujian Jinhua Company of China? What are the details?</p> <p>Answer: Between 2016 and 2017, Fujian Jinhua Company sent about 20 to 30 employees to stay at UMC's Tainan 12A Factory district, and requested UMC to provide an independent office. The IT Division which I was responsible for provided Fujian Jinhua Company personnel with the necessary office computer equipment. As for Fujian Jinhua's goal in dispatching personnel to the Tainan 12A Factory district, it is supposed to be on wafer production technology cooperation. After this particular office was setup, I made a trip to Tainan's 12A Factory, so I had contact with Simon (who is Taiwanese; I knew Simon when he was with the Powerchip Company; I forgot his Chinese name), Fujian Jinhua Company's IT supervisor. When we chatted, Simon did mention they want to use the same CIM system as UMC, so he asked me about the related details, but Fujian Jinhua Company ended up using another company's CIM system.</p>
WANG Bangming Pg 7	12/19/2018	D-0000875_HT-00001	<p>Answer: No, my department colleagues and I did not detect any Micron related files in the UMC network server. At the time, UMC information security protection, antileaking matters were handled by colleagues from the IT Division. When our colleagues changed computers or leave their posts, we would inspect their individual computer LOG record, to ensure there isn't abnormality. An example is saving information on the USB, etc.; if that happens, we would notify this colleague's direct supervisor for evaluation. As such, it is this colleague's direct supervisor who would evaluate the information, our responsibility at the IT Division was merely to inspect instead of making a judgement on the content, therefore we would not be able to know if abnormalities occurred in the content.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
WANG Bangming Pg 7	12/19/2018	D-0000875_HT-00001	<p>Question: In December of 2015, was any detection made in terms of abnormal information leakage as described above in a colleague's computer?</p> <p>Answer: Yes, in December, 2015, something unusual was indeed detected in the computers of new employees HE Jianing and Li Fuzhe. There is record a large quantity of information was copied to the USB(s) from company issued laptop computers. Our concern was that HE Jianing and Li Fuzhe are ones to leak UMC secrets, so we notified their direct supervisor, CHEN Zhengkun. We asked CHEN Zhengkun to confirm whether or not the information was related to UMC secrets. But CHEN Zhengkun later replied the information did not involve UMC secrets, so we put this unusual matter to a close. We actually did not pay any special attention to this matter until last year (2017), when colleagues at the Tainan factory were searched and interviewed by a unit from the Ministry of Justice, it was then we reinvestigated this matter.</p>
WANG Bangming Pg 8	12/19/2018	D-0000875_HT-00001	<p>Question: At the time, which department did HE Jianing and Li Fuzhe belong to?</p> <p>Answer: At the time in December 2015, HE Jianing and Li Fuzhe have just begin working at UMC for about a month, so they were not assigned to an official department; they belonged to a new department set-up by CHEN Zhengkun which consists of only three people: HE Jianing, Li Fuzhe, and CHEN Zhengkun. PM was the department CHEN Zhengkun later set up which specializes in memory technology development, but I'm not sure of the department's Chinese name.</p>
WANG Bangming Pg 8	12/19/2018	D-0000875_HT-00001	<p>Question: Continued from above, what was the result of the investigation?</p> <p>Answer: In 2017, after the Tainan factory was searched and colleagues from the department (the PM Department) were interviewed by a Ministry of Justice unit, we were concerned about whether or not those colleagues interviewed leaked UMC secrets, so we made a special point to re-examine the PM Department's LOG prior to 2017, for record of anything unusual; the only discovery made was at the end of December, 2015, an unusual record of USB file transfer (files from the computer transferred to the USB), which at the time the engineer in charge verified with CHEN Zhengkun, the head of the department; and because CHEN Zhengkun replied it was not an issue, the engineer in charge closed the case on this unusual matter. Given there was no other unusual record, we closed the case for this one and only unusual matter, which is why there were no issues following the 2017 examination.</p>
WANG Bangming Pg 10	12/19/2018	D-0000875_HT-00001	<p>All UMC employees are equipped with company-issued computers. Employees can choose between a desktop or a laptop computer, and none of the USB ports can be utilized except through a separate application process.</p>
WANG Bangming Pg 10	12/19/2018	D-0000875_HT-00001	<p>Question: Do you know if CHEN Zhengkun approved issuance of laptop computer[s] with special functions? What was the purpose?</p> <p>Answer: At UMC, every employee has their choice of one computer (limit one), be it a desktop or a laptop per approval by the department's Level-1 supervisor. If the department has a special need for a general-use computer, an application has to be submitted to the department secretary. The general-use computer can either be placed in the office for general access, or be kept by the secretary pending application for release to someone who needs it. Upon checking the application record, I found that prior to establishment of the new department in December, 2015, ZHUO Jianzhong, a colleague in the IT Department which I managed, applied for two general-use laptop computers for the purpose of utilization by an VIP. Per my inquiry, the "VIP" turned out to be CHEN Zhengkun. On record, these two laptop computers were assigned to HUANG Wanling (still employed but not sure of the name) of the Human Resources Department at Tainan's 12A Factory district. However, I am not sure who actually had custody over them. That is why, in reality, CHEN Zhengkun did not approved issuance of special function computer[s], I was the one who approved the issuance following submission of an application from ZHUO Jianzhong, my colleague from the IT Department.</p>
WANG Bangming Pg 11	12/19/2018	D-0000875_HT-00001	<p>Question: Continued from above, how were these two laptop computers different than the usual laptop computers issued by UMC?</p> <p>Answer: There are no difference, these two were not brand new computers, they were returns from colleagues who left the company, reconfigured and given to CHEN Zhengkun's department for utilization.</p>
WANG Bangming Pg 11	12/19/2018	D-0000875_HT-00001	<p>Question: Do you know the whereabouts of the above two laptop computers?</p> <p>Answer: One laptop computer was seized by the Judicial unit in 2017, and we are still looking for the other one. The current keeper of these two laptop computers is still HUANG Wanling.</p>
WANG Bangming Pg 11	12/19/2018	D-0000875_HT-00001	<p>Question: You described that ZHUO Jianzhong, a colleague of the IT department, applied two laptop computers for usage by the VIP (aka CHEN Zhengkun), accountable by HUANG Wanling. However, one of the two laptops is still in the process of being found. When did UMC start looking for it? What kind of explanation did HUANG Wanling provide on this matter?</p> <p>Answer: The week before last, which was the beginning of December, UMC legal personnel notified our department's Deputy Division Director, ZHOU Xinhong that a search is initiated for the two laptop computers applied for by ZHUO Jianzhong, that was when we began to conduct the search. We found one of the laptops was seized by the law enforcement agency, and the other computer has yet to be found. According to HUANG Wanling, she was merely the keeper in name of these two computers right after they were issued. In reality, the PM Department has been using these two computers all along for general business. As to whom HUANG Wanling gave these two computers to in the PM Department, I did not make a point to inquire with the IT Department colleague who was responsible for the investigation.</p>
WANG Bangming Pg 12	12/19/2018	D-0000875_HT-00001	<p>Question: Are there other incidents where UMC was unable to find its computer[s]? What is the ratio and frequency?</p> <p>Answer: UMC has over 17,000 computers, with just one or two missing every year, so the ratio is not high.</p>
WANG Bangming Pg 2	12/19/2018	D-0000889_HT-00001	<p>Question: On the investigation record, you stated the company detected abnormality and wanted to inspect HE Jianing and Li Fuzhe's respective computers, what was the reason for that?</p> <p>Answer: UMC adopts leak prevention design to protect information security. In 2015, an engineer in my IT department informed me CHEN Zhengkun's department staff submitted a request for us to assist in cleaning out files in the hard disk drive. By standard procedure, the host computer log must be checked for violation of regulations prior to changing and/or cleaning the hard drive; because individual computers at UMC are installed with USB file transfer detection software, and we are concerned about technical information leakage, so whenever a unit requests a change in the hard-drive, or when a departing employee returns his/her computer, we would always check to confirm whether or not there was any transfer record on the computer. My colleagues' description was that when they were about to conduct the cleaning of the hard disk, they discovered on record a large amount of information was transferred from the computer to the USB from HE Jianing and Li Fuzhe's computers. Our software works in such a way that once a USB transfer is detected, a return record would be generated and sent to the host computer for creation of a LOG file to indicate the detection. When this happens, we would consolidate the record, and send it to the supervisor responsible to confirm whether or not it contains UMC Company secrets, because the name of the transferred files' would appear on the LOG. At that time, CHEN Zhengkun's unit consists only of three people, HE Jianing, Li Fuzhe, and Supervisor CHEN Zhengkun. Our engineer notified CHEN Zhengkun all of the file names, with the purpose of verifying whether or not they contained UMC Company secrets. CHEN Zhengkun replied the files did not contain UMC secrets.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
WANG Bangming Pg 2	12/19/2018	D-0000889_HT-00001	<p>Question: Have you encountered similar incidents where a request is made to delete [files] from hard-drive?</p> <p>Answer: I don't recall such requests were ever made by the other units. It is only when employees leave the company and return their computer will there be a cleanup of the files in the hard-drive, because of the need for a thorough cleanup for use by another person.</p>
WANG Bangming Pg 4	12/19/2018	D-0000889_HT-00001	<p>Question: About the abnormal incident mentioned above, other than notifying CHEN Zhengkun, was anyone else notified at UMC?</p> <p>Answer: If it was ZHUO Jianzhong, he should have reported to his supervisor, ZHOU Xinhong, and ZHOU Xinhong would notify CHEN Zhengkun and myself; other than that, no one else would be notified. Usually, we would not reach out to the Legal Department and the Human Resources Department for assistance until the supervisor determines the content is secret, because that would be a violation.</p>
WANG Bangming Pg 4	12/19/2018	D-0000889_HT-00001	<p>Question: When CHEN Zhengkun replied there was no issue, who did he report that to? Do you know how CHEN Zhengkun did the checking?</p> <p>Answer: He should have notified ZHUO Jianzhong, but I don't know how CHEN Zhengkun did the checking. We would have sent the files to CHEN Zhengkun for verification.</p>
WANG Bangming Pg 4	12/19/2018	D-0000889_HT-00001	<p>Question: About the quantity of the abnormal files mentioned, how long did it take to check?</p> <p>Answer: I remember that it was over one thousand files. We only had the file names and we were not able to look at the contents. There should be record on the volume, but I don't recall how big it was.</p>
WANG Bangming Pg 5	12/19/2018	D-0000889_HT-00001	<p>Question: In the department that CHEN Zhengkun belonged to, were other applications submitted for shared laptop computers?</p> <p>Answer: Results of our inspection from two weeks ago showed a total of six shared computers; two shared computers were applied for by the three: HE Jianting, CHEN Zhengkun and LI Fuzhe.</p>
WANG Bangming Pg 5	12/19/2018	D-0000889_HT-00001	<p>Question: Was the application under HUANG Wanjun's name?</p> <p>Answer: From related application information I reviewed, it should have been under ZHUO Jianzhong, and HUANG Wanjun was entrusted as the keeper after application.</p>
WANG Bangming Pg 5	12/19/2018	D-0000889_HT-00001	<p>Question: Does UMC still have these two computers' application information?</p> <p>Answer: Yes, it's still in the system.</p>
WANG Bangming Pg 5	12/19/2018	D-0000889_HT-00001	<p>Question: The two shared computers applied for mentioned above, was one of them seized by the District Prosecutors Office in the aforementioned case?</p> <p>Answer: Yes.</p>
WANG Bangming Pg 7	12/19/2018	D-0000889_HT-00001	<p>Question: Following the search at UMC, was there an investigation launched by the company's legal department?</p> <p>Answer: Yes, HUANG Enxu, the Legal Division Director, came to obtain an understanding of the inspection results and related circumstances we conducted on the LOG files.</p>
WANG Bangming Pg 8	12/19/2018	D-0000889_HT-00001	<p>Question: At this point, UMC is unable to locate this missing computer, what could be the reason? Did UMC look for it?</p> <p>Answer: We were not asked previously to find this computer. Three weeks ago, an attorney from the US contacted our Legal Department in hope to find this computer. At that time, they listed two sets of computer serial numbers; our search result showed that one unit was seized by the District Prosecutors' Office, and the other unit was missing, it was then we started the search for the missing computer.</p>
WANG Bangming Pg 8	12/19/2018	D-0000889_HT-00001	<p>Question: In the year 2015, was there any application for USB usage on HE Jianting's and LI Fuzhe's two computers?</p> <p>Answer: Yes, I saw the record. They applied for USB read/write function that can upload and download information.</p>
WEI Mingde Pg 7	12/20/2018	D-0000904_HT-00001	<p>Q: Did UMC provide the final version of the design rule to Japanese UMI?</p> <p>A: Japanese UMI did not receive the final version of the DESIGN RULE from UMC, because they did not need to utilize the DESIGN RULE from UMC and thus, it has no value to them. That is because chip design that Japanese UMI will provide to UMC is finished.</p>
WEI Mingde Pg 7	12/20/2018	D-0000904_HT-00001	<p>Q: Did Japanese UMI provide UMC's DESIGN RULE program code to Fujian Jinhua Integrated Circuit Co., Ltd. in China?</p> <p>A: UMC did not provide its DESIGN RULE to Fujian Jinhua Integrated Circuit Co., Ltd. in China through Japanese UMI. Based on its contract with Fujian Jinhua Integrated Circuit Co., Ltd. in China, UMC did provide the DESIGN RULE for the F32 DRAM project, written and verified by UMC, to Fujian Jinhua Integrated Circuit Co., Ltd. in China.</p>
WU Guohao Pg 5	12/20/2018	D-0000924_HT-00001	<p>Q: Please explain what Ultra Memory, Inc. (to be called UMI thereafter) is?</p> <p>A: Ultra Memory, Inc. is a Japanese-owned limited liability company. UMC and UMI worked jointly to develop DRAM. UMI would provide the chip design diagrams to UMC to manufacture. After UMC completed the work, the finished products would be delivered to UMI. But there had been no mass production yet.</p>
WU Guohao Pg 6	12/20/2018	D-0000924_HT-00001	<p>Q: To follow up on that, have you had any contacts with UMI in your work?</p> <p>A: No. After I took my position at the New Business Development Department, I could only get UMI's chip design diagrams. Then we would do reverse programming, analyze the dimensions of the diagrams, and identify the diagram with the minimum size. We would then work with our company's manufacturing process department to confirm whether it could be materialized. If it could not be materialized, it would mean that UMI's design was flawed.</p>
WU Guohao Pg 10	12/20/2018	D-0000924_HT-00001	<p>Q: On February 14th, 2017, you made a written statement in this office in the investigation: "ESMT is UMC's F32 DRAM customer; therefore, ESMT would be providing design diagrams to UMC, including the "32 nm DRAM Process Topological Layout Rule". (Ver. 0.1_P.4), as well as the program code for the design rule so that ESMT can execute on the design diagrams". Does the one mentioned there, "32 nm DRAM Process Topological Layout Rule" (Ver. 0.1_P.4), contain data provided by WANG Yongming [STC-3769/3057/6900]?</p> <p>A: Yes. I collected the data provided by WANG Yongming. "32 nm DRAM Process Topological Layout Rule" is in fact the 32 nm DRAM process topological design layout rule.</p>

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WU Guohao Pg 10	12/20/2018	D-0000924_HT-00001	<p>Q: To follow up on that, what is the latest version of "32 nm DRAM Process Topological Layout Rule"? When was "32 nm DRAM Process Topological Layout Rule" (Ver. 0.1_P.4) released?</p> <p>A: The latest version of "32 nm DRAM Process Topological Layout Rule" is "Ver. 0.3", while "Ver. 0.1_P.4" was a version two years ago—it is the version when WANG Yongming just started at UMC. The version of our design rule undergoes modification approximately every one to three months.</p>
WU Guohao Pg 10	12/20/2018	D-0000924_HT-00001	<p>Q: To follow up on that, does "32 nm DRAM Process Topological Layout Rule" (Ver. 0.1_P.3) also contain data provided by WANG Yongming? What data did WANG Yongming provide?</p> <p>A: Yes. The "Ver. 0.1_P.3" version also contains data provided by WANG Yongming. But when WANG Yongming and I discussed the design rule, we would often discuss along a major direction, including things about engineering, even though we did not limit to certain items, the discussions were mostly related to component characteristics.</p>
WU Kunrong Pg. 1	1/29/2019	D-0000942_HT-00001	<p>Answer: I hold a position at Fujian Jinhua Integrated Circuit Co., Ltd. (referred to below as Jinhua Co.) my current job title is Deputy Chief Operating Officer, and I am primarily responsible for factory operations, that is, mass production at the factory and the areas related to production all fall under the scope of the work of the Deputy Chief Operating Officer.</p>
WU Kunrong - Pg.1	1/29/2019	D-0000942_HT-00001	<p>Question: Before you were at Jinhua Co., where were you working?</p> <p>Answer: I previously held a position at Powerchip Semiconductor Corporation (referred to below as Powerchip Corporation), I started holding the position around 1995 or 1996 under the Western calendar, and I resigned in July 2016; at Powerchip Corporation, my last job title was Deputy Chief Research and Development Officer, and I was responsible for the development of logic technology and FLASH products.</p>
WU Kunrong - Pg.2	1/29/2019	D-0000942_HT-00001	<p>Question: By what channels did you take the position at Jinhua Co.?</p> <p>Answer: I have been acquainted with CHEN Chengkun for many years, CHEN Chengkun was my supervisor when I previously held the position at Powerchip Corporation, and we have always kept in touch; in my last few years at Powerchip Corporation, I was not very satisfied with the work I was doing, and after I discussed with CHEN Chengkun, I learned that there was this opportunity to go to Jinhua Co.; later, I had an interview with CHEN Chengkun, it's been kind of a long time since the interview, I can't remember, the location was likely Hsinchu, I can't really remember the actual address, and the people taking part in the interview were just me and CHEN Chengkun.</p> <p>Question: While carrying out the interview, how did CHEN Chengkun introduce the work you were to perform?</p> <p>Answer: Because CHEN Chengkun and I have been acquainted for a very long time, and before he had also been my supervisor, he just said to me that the contents of the new job were to be responsible for work related to mass production of DRAM, and for the part about the salary, I provided my salary at Powerchip to CHEN Chengkun for reference.</p>
WU Kunrong - Pg.2	1/29/2019	D-0000942_HT-00001	<p>Question: At the time, did CHEN Chengkun specifically mention your job title at Jinhua Co.?</p> <p>Answer: He mentioned that it was to serve as the Deputy Chief Operating Officer.</p>
WU Kunrong - Pg.2	1/29/2019	D-0000942_HT-00001	<p>Question: You currently serve as Deputy Chief Operating Officer at Jinhua Co., what organizations are below the Deputy Chief Operating Officer?</p> <p>Answer: Under my jurisdiction, within the factory, there's the Manufacturing Division and the Process Technology Division, and outside the factory, there's the Integration Technology Division, and the Quality Division.</p>
WU Kunrong - Pg.2	1/29/2019	D-0000942_HT-00001	<p>Question: What is the organization above you at Jinhua Co.?</p> <p>Answer: There is the president CHEN Chengkun, above the president is the board of directors, there are around 5 or 7 directors, and the current board chair is LU Wensheng, of Mainland nationality.</p>
WU Kunrong - Pg.3	1/29/2019	D-0000942_HT-00001	<p>Question: Where are the headquarters of Jinhua Co.?</p> <p>Answer: In Jinjiang City, Quanzhou, Fujian Province.</p>
WU Kunrong - Pg.3	1/29/2019	D-0000942_HT-00001	<p>Question: Which people are the financers of Jinhua Co.?</p> <p>Answer: Chiefly, there is the Fujian Electronics and Information Group, as well as industrial investment companies in Quanzhou and Jinjiang, I can't remember the company names.</p>
WU Kunrong - Pg.3	1/29/2019	D-0000942_HT-00001	<p>Question: Is Jinhua Co. classified as a private company, or does it receive government funding from the Mainland region?</p> <p>Answer: As far as I know, there is funding from the governments of Quanzhou and Jinjiang in Fujian.</p>
WU Kunrong - Pg.3	1/29/2019	D-0000942_HT-00001	<p>Question: Of the aforesaid 4 hundred million USD, how much money has Jinhua Co. already paid to United Microelectronics Corporation? When was it paid?</p> <p>Answer: I'm not clear on the detailed amounts, the detailed payment schedule, I'm not clear, have to look at the contract.</p>
WU Kunrong - Pg.3	1/29/2019	D-0000942_HT-00001	<p>Question: With respect to the above technology contract agreement, within Jinhua Co., who would know the most about how much money has already been paid to United Microelectronics Corporation?</p> <p>Answer: The Financial Division of Jinhua Co. is likely the most clear on it; the Financial Division is directly subordinate to the president's unit, and the head of the Financial Division is currently WU Junsheng, of Mainland nationality.</p>
WU Kunrong - Pg.4	1/29/2019	D-0000942_HT-00001	<p>Question: You serve as the Deputy Chief Operating Officer at Jinhua Co., are there parts of the technology contract agreement signed between the two companies which you are responsible for overseeing?</p> <p>Answer: What I am responsible for is, once the technological development is complete, transferring to Jinhua Co. to carry out mass production of DRAM.</p>
WU Kunrong - Pg.4	1/29/2019	D-0000942_HT-00001	<p>Question: Can you concretely describe which data Jinhua Co. has already obtained?</p> <p>Answer: It's primarily data on equipment parameters and process parameters.</p> <p>Question: By what means were these data delivered to Jinhua Co.?</p> <p>Answer: Via electronic files. Question: When was the delivery of the above-mentioned data completed?</p> <p>Answer: It was around the period of August or September 2018.</p>

Name of interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
WU Kunrong - Pg.5	1/29/2019	D-0000942_HT-00001	<p>Question: As far as you know, which departments of United Microelectronics Corporation transferred the DRAM technology to Jinhua Co.?</p> <p>Answer: The contact window was PROJET M [sic] at United Microelectronics Corporation; two or three divisions were established under this organization, and the people in charge were RONG Letien and TSOU Shihfang.</p>
WU Kunrong - Pg.5	1/29/2019	D-0000942_HT-00001	<p>Question: The person in charge responsible for the technology transfer at United Microelectronics Corporation?</p> <p>Answer: That was TSOU Shihfang, it seems like his job title was assistant manager or the division head.</p>
WU Kunrong - Pg.5	1/29/2019	D-0000942_HT-00001	<p>Question: As far as you know, according to the contract signed by both parties, after United Microelectronics Corporation completed the transfer of the DRAM technology, under whose ownership did said technology belong?</p> <p>Answer: From what I understand of the contract, the technology was jointly owned by both parties.</p>
WU Kunrong - Pg.5	1/29/2019	D-0000942_HT-00001	<p>Question: As far as you know, how many people have held positions at United Microelectronics Corporation while simultaneously signing consultant contracts or labor contracts with Jinhua Co.?</p> <p>Answer: As far as I know, there were likely no more than 10 consultants; as for labor contracts, in theory, there likely would not be any, apart from CHEN Chengkun, he had received approval from the Board of Directors of United Microelectronics Corporation allowing him to simultaneously hold a position at Jinhua Co., for other people that was likely impossible.</p>
WU Kunrong - Pg.6	1/29/2019	D-0000942_HT-00001	<p>Question: Do you know the reason why people holding positions at United Microelectronics Corporation simultaneously signed the consultant contracts provided by Jinhua Co.?</p> <p>Answer: This isn't business for which I am responsible; I heard that the salary at United Microelectronics Corporation certainly cannot meet the requirements of a foreigner or an engineer with respect to salary, so there are a small number of personnel who satisfy needs in this area by signing consultant contracts with Jinhua Co.</p>
WU Kunrong - Pg.7	1/29/2019	D-0000942_HT-00001	<p>Question: You said just now that there is an organization at United Microelectronics Corporation, PROJECT M, which is responsible for delivering the DRAM technology and documents to Jinhua Co., so it is this organization that's responsible for carrying out the matter of technological cooperation between United Microelectronics Corporation and Jinhua Co.?</p> <p>Answer: The agreement between the two parties involves not just technology, it also includes business affairs and financial affairs, but in relation to engineering, it is PROJECT M that's handling it.</p>
XIAO Xinhuang Pg 1	1/29/2019	D-0000954_HT-00001	<p>Question: Where do you currently work? How long have you worked there?</p> <p>Answer: At present, I work at Fujian Jinhua Integrated Circuit Co., Ltd. (referred to below as Jinhua Co.), I started in the position at Jinhua Co. in February 2017, serving as the Director of the Information Technology Division, responsible for the construction and development of the personnel system, purchasing system, finance and accounting systems, and general affairs system, the distribution of company computers for individuals, and management of the employee mail system.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: What was your job before you were at Jinhua Co.?</p> <p>Answer: I held a position at Taiwan Micron Inc., I formerly served as the Taiwan Corp IT Manager and Asia Pacific Solution Director at that company.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: Why did you resign from Taiwan Micron Inc.?</p> <p>Answer: My original team at Taiwan Micron Inc. had become 3 or 4 organizations due to a reorganization, and I was informed that I would be responsible for one of these organizations, which was the Asia Pacific Solution Director; the scope of my work had narrowed, and I had a sense of crisis, and also had a bad feeling, so this gave rise to the idea of resigning.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: Through what channels were you recruited by Jinhua Co.?</p> <p>Answer: When I decided to look for a new job, in July or August 2016 under the Western calendar, I got in contact with CHEN Chengkun, at the time he was the Senior Vice President at United Microelectronics Corporation, and I said to him that I was thinking of resigning from Micron, and were there any job opportunities. He mentioned to me that I could go to Jinhua Co., and help him handle some IT matters, that is, systems management.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: Before you went to take the position at Jinhua Co., was an interview held?</p> <p>Answer: After I had the discussion with CHEN Chengkun, I directly went to take the position at Jinhua Co., and didn't go through a formal interview procedure.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: When you got in contact with CHEN Chengkun about going to work at Jinhua Co., did CHEN Chengkun inform you what the salary would be?</p> <p>Answer: No.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: When CHEN Chengkun was negotiating with you, did he promise that you could serve in a supervisor position at Jinhua Co.?</p> <p>Answer: No, he just said to me that the job contents were to assist him in handling the systems, but he did not say a specific job title.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: Before you went to take the position at Jinhua Co., apart from CHEN Chengkun, were you acquainted with other employees?</p> <p>Answer: No.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: You serve as Director of the Information Technology Division at Jinhua Co., who is your superior?</p> <p>Answer: That's CHEN Chengkun.</p>
XIAO Xinhuang Pg 2	1/29/2019	D-0000954_HT-00001	<p>Question: Above CHEN Chengkun, there is the Jinhua Co. Board of Directors?</p> <p>Answer: Must be.</p>
XIAO Xinhuang Pg 3	1/29/2019	D-0000954_HT-00001	<p>Question: What is the management organization and structure at Jinhua Co.?</p> <p>Answer: I've heard about the Board of Directors, I'm not sure how many directors there are, the current Board Chair is surnamed LU, not sure of the specific name, I'm not familiar with the Board of Directors, I only know that my boss is CHEN Chengkun.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
YOU Zhenfu Pg 1	1/29/2019	D-0000960_HT-00001	<p>Question: Where do you currently work? How long have you worked there?</p> <p>Answer: I currently work at Fujian Jinhua Integrated Circuit Co., Ltd. (referred to below as Jinhua Co.), I started working in late March 2017 under the Western calendar, and I am the Director of the Human Resources Division at Jinhua Co.</p>
YOU Zhenfu Pg 2	1/29/2019	D-0000960_HT-00001	<p>Question: Explain who your direct superior is for the Division of Human Resources at Jinhua Co?</p> <p>Answer: My direct superior is President CHEN Chengkun, and above the President, the Board Chair is a person of Mainland nationality, LU Wensheng.</p>
YOU Zhenfu Pg 2	1/29/2019	D-0000960_HT-00001	<p>Question: Your previous company before taking the position at Jinhua Co.?</p> <p>Answer: United Microelectronics Corporation, I started in a position at Microelectronics Corporation in February 1999, and in March 2017 under the Western calendar, I resigned from United Microelectronics Corporation; the reason was that I switched to a position at Jinhua Co., because I knew there was an opportunity at Jinhua Co., I actively made contact, and went to Jinhua Co. of my own accord.</p>
YOU Zhenfu Pg 2	1/29/2019	D-0000960_HT-00001	<p>Question: Before you went to take the position at Jinhua Co., did you receive an interview?</p> <p>Answer: In October 2016, I wrote a letter to Mr. CHEN Chengkun, inquiring of him whether there could be an opportunity to take a position at Jinhua Co.; at the time, CHEN Chengkun was the Senior Vice President at United Microelectronics Corporation; later, in January 2017, I received an interview at the temporary offices of Jinhua Co. in Jinjiang City, Fujian Province, and at that time, it was an interview with the then-Board Chair of Jinhua Co. (that is, SHAO Yulong, a person of Mainland nationality). As to whether there were other people present during the interview at that time, I don't remember, but I remember that CHEN Chengkun also sat in.</p>
YOU Zhenfu Pg 3	1/29/2019	D-0000960_HT-00001	<p>Question: The above-mentioned talent recruitment activity, was it held because United Microelectronics Corporation and Jinhua Co. were thereafter going to engage in DRAM technology cooperation?</p> <p>Answer: This talent recruitment was initiated by Jinhua Co., I'm not very clear on its objective.</p>
YOU Zhenfu Pg 3	1/29/2019	D-0000960_HT-00001	<p>Question: How many people did United Microelectronics Corporation send to participate in the recruitment activity in Santa Clara, California?</p> <p>Answer: I need to explain that this activity was not like the talent recruitment I'm familiar with, it was meant to just purely be gathering resumes on the scene from those with a mind to go take a position at Jinhua Co., the people from United Microelectronics Corporation who were present included Senior Vice President CHEN Chengkun, as well as the assistants to the Vice President, KUO Peishan and WANG Junfen (she was my subordinate in the Human Resources Department at United Microelectronics Corporation at the time), and Jinhua Co. sent Vice President WU Kunrong as well as Vice President XU Zheng (a person of Mainland nationality) to attend.</p>
YOU Zhenfu Pg 4	1/29/2019	D-0000960_HT-00001	<p>Question: Do you know if there were personnel holding positions at United Microelectronics Corporation who simultaneously also signed labor contracts with Jinhua Co.?</p> <p>Answer: I know that there were a few employees of United Microelectronics Corporation who signed consultant agreements with Jinhua Co., as far as I know, those who signed labor contracts were formal employees of Jinhua Co., while those who signed consultant agreements just served in consultant positions at Jinhua Co.</p>
YOU Zhenfu Pg 4	1/29/2019	D-0000960_HT-00001	<p>Question: As far as you know, which type was the contract signed between CHEN Chengkun and Jinhua Co.?</p> <p>Answer: After I took the position, CHEN Chengkun did sign a labor contract.</p>
YOU Zhenfu Pg 4	1/29/2019	D-0000960	<p>Question: As far as you know, did CHEN Chengkun ever simultaneously serve in positions at United Microelectronics Corporation and Jinhua Co.? What was the time period?</p> <p>Answer: Yes, CHEN Chengkun on the one hand served as Senior Vice President at United Microelectronics Corporation, and also served as President of Jinhua Co., I'm not very clear on the time period during which he simultaneously served in the above two positions.</p>
ZHANG Jianping Pg 3	4/22/2019	USD-0838615_HT00001	<p>Q: Are you responsible for the scope of work involving technology transfer from UMC to the Fujian Jinhua Company in Mainland China?</p> <p>A: Around August of 2018 when UMC formally initiated its technology transfer plan to the Fujian Jinhua Company of Mainland China, I was appointed as a coordinator of the technology transfer plan for the PM2 Department; ten other people from the PM2 Department were also appointed as part of a temporary team to participate in the technology transfer. The ones I remember include CHEN Yi-Yi and SHI Zhongping of the PM2 Department, but I don't remember the names of the others. Your office may contact UMC to request a detailed list of names if needed.</p>
ZHANG Jianping Pg 4	4/22/2019	USD-0838615_HT00001	<p>Q: Have you provided Jinhua Company of Mainland China with progress reports or updated progress on the research and development of the F32/F32S DRAM technology?</p> <p>A: Yes, I was in contact with CHEN Huihuang to update transfer progress of the F32 DRAM.</p>
ZHANG Jianping Pg 4	4/22/2019	USD-0838615_HT00001	<p>Q: When did you start sending the F32/F32S DRAM technology R&D progress report to Mainland China's Fujian Jinhua Company? What's the frequency?</p> <p>A: I don't recall the specific time; it might be around the end of 2017 or the beginning of 2018. I just sent the reports on the F32 DRAM R&D progress according to CHEN Huihuang's requirements approximately every one or two weeks.</p>
ZHANG Jianping Pg 4	4/22/2019	USD-0838615_HT00001	<p>Q: Please describe in detail the type of technology UMC is transferring to the Fujian Jinhua Company in China.</p> <p>A: Currently the transfers are only related to the F32 DRAM related documents; there are no F32S DRAM technology transfers.</p>
ZHANG Jianping Pg 5	4/22/2019	USD-0838615_HT00001	<p>Q: Continued from above, when did the technology transfer begin to take place? How did it take place?</p> <p>A: As I mentioned earlier, the official timeline was August of 2018, and the preparation for the official transfer began in June of 2018. As for how it was done, various departments under PM would form small groups catered to the transfer. The transfer documents would then be gathered and sent to the Information Security (IS) Department at UMC. After receiving confirmation from the IS Department and the Legal Affairs Department, the documents would be transferred from the IS Department to the Jinhua Company in Mainland China via FTP method.</p>
ZHANG Jianping Pg 5	4/22/2019	USD-0838621_HT00001	<p>Q: Do you know about the technology transfer from UMC to Mainland China's Fujian Jinhua Company?</p> <p>A: I do. I do have contact with this part of the work. The transfer is part of the contract they signed, Jinhua makes a payment to UMC who is responsible for transferring the technology to Jinhua--this is my understanding, but I have not seen the contract. This project initiated in August of last year. I am the coordinator of the technology transfer PM2 Department; up to two people are assigned to assist me in each section--a total of ten people are involved--they are here to help me on a temporary basis.</p>
ZHANG Jianping Pg 5	4/22/2019	USD-0838621_HT00001	<p>Q: Later on, what kind of technology did UMC transferred to Mainland China's Fujian Jinhua Company?</p> <p>A: Only F32 which mainly has to do with data for the transfer process, F32S is not included.</p>

Name of Interviewee and pg. # of Tr.	Date of Interview	Bates	QUOTE/STATEMENT (Translated)
ZHANG Jianping Pg 5	4/22/2019	USD-0838621-HT00001	<p>Q: Can you provide details of the F32 DARM [sic] technology information transferred to Mainland China's Fujian Jinhua Company? Who produced the detailed content or images, where was it from and how was it obtained? Transferred to whom? Who determines which documents were transferred and the timeframe it was to be transferred?</p> <p>A: UMC has a complete table of the detailed information that needs to be obtained from UMC; I don't have the ability to provide it. This is done in accordance to UMC SOP's technology transfer policy and practice which also includes UMC's official memorandum directive, procedure, policy, target and document which we execute based on the memorandum. The detailed content is based on the prior LIST; someone at UMC is assigned to produce this memorandum by copying the previous SOP; I'm not the person involved. The transferred technology is a product of UMC's R&D; the FTP method was used to transfer to Jinhua's IT Department, sign-off by CHEN Huiyang; the timeframe was based on what is in the memorandum which can be found in the department where the memorandum was produced. It was neither RONG Letian nor myself who made the decision on the transfer, the official memorandum had to go through Legal Affairs and the IT Department for the decision.</p>
ZHANG Jianping Pg 1	4/22/2019	USD-0838627-HT00001	<p>Q: The technology you mentioned that was transferred to the Fujian Jinhua Company in Mainland China, were they hard-copy documents or were they electronic files?</p> <p>A: As far as I know they is no hard-copy documents; they were electronic files transmitted through FTP.</p>
ZHANG Jianping Pg 1	4/22/2019	USD-0838627-HT00001	<p>Q: Please describe in detail the numbers and dates the files were transmitted, and what were the size of the files?</p> <p>A: I remember there were two times. The first time was around September of 2018, and the second time should be in October of 2018. These are the two times I personally handled them. During the first time, if I remember it correctly, the document was relatively large, with more than ten thousand document files, but I don't recall how large the files were. For the second time, there were over four thousand files; I don't remember the file size.</p>

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Exhibit C

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
Stephen Chen	7/10/2018	USD-0351510	36	<p>Q. When did you leave Micron?</p> <p>A. 2015, July.</p>
Stephen Chen	7/10/2018	USD-0351510	36	<p>Q. What date did you start at UMC?</p> <p>A. In September.</p>
Stephen Chen	7/10/2018	USD-0351510	37	<p>Q. September 2015, you joined UMC?</p> <p>A. Yes.</p>
Stephen Chen	7/10/2018	USD-0351510	37	<p>Q. To be clear, UMC was not in the DRAM business in September 2015; correct?</p> <p>A. Yes.</p>
Stephen Chen	7/10/2018	USD-0351510	38	<p>Q. When you joined UMC in September 2015, what was your title?</p> <p>A. Senior VP.</p>
Stephen Chen	7/10/2018	USD-0351510	38	<p>Q. What's your title -- what was your next title at UMC, if it changed?</p> <p>A. No, I have been the senior VP the whole time.</p>
Stephen Chen	7/10/2018	USD-0351510	41	<p>Q. Is Project M the DRAM project that involves UMC's technical cooperation with Jinhua?</p> <p>A. (In English) Yes.</p>
Stephen Chen	7/10/2018	USD-0351510	42	<p>Q. Were you involved in those business discussions regarding Project M before February 2016?</p> <p>A. I was involved starting at the end of 2015 all the way to the beginning of 2016.</p>
Stephen Chen	7/10/2018	USD-0351510	43	<p>Q. And what is Mr. Huang's title at UMC?</p> <p>A. Supposedly or maybe deputy director of finance.</p>
Stephen Chen	7/10/2018	USD-0351510	44	<p>Q. What does "M" stand for in Project M?</p> <p>A. The name is given by our former CEO. "M" stands for "memory". It's also a collaboration project with mainland China.</p>
Stephen Chen	7/10/2018	USD-0351510	47	<p>Q. Are you the president of Jinhua today?</p> <p>A. Yes. I am wearing two hats now.</p> <p>Q. Who pays your salary?</p> <p>A. UMC.</p> <p>Q. Do you receive any compensation from Jinhua?</p> <p>A. Only started in the second half of 2017.</p> <p>Q. In the second half of 2017, you received compensation from UMC and Jinhua?</p> <p>A. Yes.</p> <p>Q. Where's Jinhua located?</p> <p>A. In Jinjiang City in the province of Fujian.</p>
Stephen Chen	7/10/2018	USD-0351510	48	<p>Q. What are your job duties and responsibilities as the president of Jinhua?</p> <p>A. I am involved in the major decision-making processes of Jinhua, including the procurement issues as well as staffing or employment issues.</p>
Stephen Chen	7/10/2018	USD-0351510	50	<p>Q. And those meetings involved the discussions of the DRAM project between UMC and Jinhua; correct?</p> <p>A. There was very little discussion about the collaboration project between UMC and Jinhua. It was mainly Jinhua talking about its own plans.</p>
Stephen Chen	7/10/2018	USD-0351510	52	<p>Q. And does UMC use equipment for its research and development on the DRAM project?</p> <p>A. So for this joint development project, we tried to use the equipment that UMC has already had, as much as possible. For those not enough by the old equipment, then we buy new equipment. Then the new equipment and tool is from Jinhua.</p>
Stephen Chen	7/10/2018	USD-0351510	57	<p>Q. Were you involved in negotiating the technology cooperation agreement on behalf of UMC?</p> <p>A. Yes, part of it.</p>
Stephen Chen	7/10/2018	USD-0351510	57	<p>Q. And to the best of your knowledge, was that agreement entered into on May 13, 2016? Is that a correct statement?</p> <p>A. I suppose so.</p>
Stephen Chen	7/10/2018	USD-0351510	59	<p>Q. Mr. Chen, you testified that you were involved with negotiating portions of the technology cooperation agreement between UMC and Jinhua; correct?</p> <p>A. Yes.</p> <p>Q. What parts of the agreement were you responsible for negotiating?</p> <p>A. [REDACTED]</p>
Stephen Chen	7/10/2018	USD-0351510	64	<p>Q. So I'm going to ask the question again. In February 2016, to your understanding, how many Jinhua engineers experienced at DRAM technology were employed?</p> <p>A. None at Jinhua back then.</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
Stephen Chen	7/10/2018	USD-0351510	66	<p>Q. To your knowledge, did the technology cooperation agreement between UMC and Jinhua obligate UMC to assist with recruiting engineers for the joint DRAM project?</p> <p>A. No, there is no such obligation for UMC.</p>
Stephen Chen	7/10/2018	USD-0351510	68	<p>Q. Did you participate with Mr. Wu during this presentation on day 3?</p> <p>A. I was present.</p> <p>Q. Did you speak?</p> <p>A. I did not speak in the presentation. However, during the Q&A section, I was prompted to add some information on behalf of UMC regarding the technical collaboration timeframe in this joint project.</p>
Stephen Chen	7/10/2018	USD-0351510	70	<p>Q. Did anyone at UMC, to your knowledge, interview engineers during the CASPA event?</p> <p>A. Based on my understanding, it was Jennifer and Sandy Kuo from UMC who were there to collect resumes, and then they did some interviews.</p>
Stephen Chen	7/10/2018	USD-0351510	78	<p>Q. If we look at the first category, the first function is DRAM process technology. Isn't that UMC?</p> <p>A. But it was Jinhua who attended the CASPA event for its recruiting purpose. It was not UMC there to recruit people.</p>
Stephen Chen	7/10/2018	USD-0351510	78	<p>A. So Jinhua — there was Jinhua there to find people for their operation and manufacturing, not — not for their R&D. So it was an event for Jinhua, not for UMC.</p>
Stephen Chen	7/10/2018	USD-0351510	80	<p>Q. Mr. Chen, can I turn your direct attention to the next page, which lists the names of 12 individuals with positions at companies including Jinhua, UMC, and then the final four are with the -- it looks like the government of China.</p> <p>A. Yes, they are also Jinhua's shareholders.</p> <p>Q. Who is also Jinhua's shareholders?</p> <p>A. So people from Jinjiang City and Quanzhou City.</p>
Stephen Chen	7/10/2018	USD-0351510	99	<p>Q. And which companies' technology did you analyze?</p> <p>A. So mainly about the three DRAM companies, and we got information from TechInsight [sic] for our initial analysis.</p> <p>Q. All right. And what type of information did you get from TechInsights?</p> <p>A. They gave us information regarding design rule, design structure, and cell layout.</p>
Stephen Chen	7/10/2018	USD-0351510	106	<p>Q. Did TechInsights provide UMC with any Micron design rules?</p> <p>A. In TechInsights' reports, it shows part of the design rules, but not all.</p>
Stephen Chen	7/10/2018	USD-0351510	111	<p>Q. Is JT Ho still employed at UMC?</p> <p>A. Yes.</p>
Jennifer Fung	6/29/2018	USD-0351262	69	<p>Q. No. Describe for me how the hour-long event unfolded.</p> <p>A. So when I first arrived there, within that hour, someone was presenting. Someone was presenting and talking to their people asking, like, a Q & A session.</p> <p>Q. Was that person a UMC employee?</p> <p>A. It's Stephen Chen.</p>
Jennifer Fung	6/29/2018	USD-0351262	70	<p>Q. Okay. So when you arrived, there was already someone talking, and that person was Mr. Chen?</p> <p>A. Yes.</p> <p>Q. And he was fielding questions from the audience; right?</p> <p>A. (Nonverbal response).</p> <p>Q. And then what happened?</p> <p>A. There was Q and A.</p> <p>Q. Okay.</p> <p>A. So it should be, you know, answers, replies from Steven replying back to, you know, the questions being asked from the audience.</p>
Jennifer Fung	6/29/2018	USD-0351262	72	<p>Q. To the best of your recollection, did Mr. Chen ever sit down and let someone else get up and answer questions?</p> <p>A. I don't know. I couldn't remember.</p>
Jennifer Wang	7/9/2018	USD-0351361	13	<p>Q. Who is Jinhua?</p> <p>A. It's a China — it's a UMC and — joint development with Chinese company.</p> <p>Q. Is Jinhua a joint development between UMC and another company?</p> <p>A. With China.</p> <p>Q. With the country China?</p> <p>A. Yes.</p> <p>Q. Is it correct that Jinhua is a joint development between UMC and the country China?</p> <p>A. Yes.</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
Jennifer Wang	7/9/2018	USD-0351361	14	<p>MR. CHANG: I think you should call a break.</p> <p>MR. JOHNSON: Okay. Take a break. THE VIDEOGRAPHER: We are going off the record. The time is 10:19 a.m. (Break taken) THE VIDEOGRAPHER: We are back on the record. The time is 10:24 a.m. MR. JOHNSON: I think the witness had some confusion over your question. Do you want to restate your answer?</p> <p>A. Only I know it's just we have -- we have -- we are cooperate with Jinhua, so -- and about the country of China, I'm not sure, and I have no idea about that. THE COURT REPORTER: I need to clarify the answer, sorry. You said, "Only I know it's just we have -- we are [something] with Jinhua."</p> <p>THE WITNESS: "Cooperation".</p>
Jennifer Wang	7/9/2018	USD-0351361	15	<p>Q. So, Ms. Wang, what is your current title for UMC?</p> <p>A. HR manager.</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
Jennifer Wang	7/9/2018	USD-0351361	21	<p>Q. What do you recall today about the job event with CASPA that occurred in October 2016?</p> <p>THE MAIN INTERPRETER: (Chinese spoken). A. We -- we came there and interview some, some guys who were interesting about Jinhua's job.</p>
Jennifer Wang	7/9/2018	USD-0351361	22	<p>Q. How many attendees at the job fair applied for a job, to your knowledge?</p> <p>A. About -- about 20.</p> <p>Q. How many attendees were there in total at the CASPA job fair in northern California in October 2016?</p> <p>A. About 80 peoples.</p> <p>Q. 80, 80?</p> <p>A. 80, yeah. 80.</p>
Jennifer Wang	7/9/2018	USD-0351361	22	<p>Q. At the CASPA job fair in northern California in October 2016, the attendees were invited to apply for a job with Jinhua; correct?</p> <p>A. Yes.</p> <p>Q. Am I also correct that the invitees at the job fair were not invited to apply for a job directly with UMC? MR. JOHNSON: Do you understand? THE MAIN INTERPRETER: (Chinese spoken).</p> <p>A. Yes.</p> <p>BY MR. KAY: Q. To clarify, am I correct that the attendees at the CASPA job fair were not invited to apply for a job with UMC?</p> <p>A. Yes.</p>
Jennifer Wang	7/9/2018	USD-0351361	31	<p>Q. When the five UMC people went to the CASPA job fair, was that for the purpose of finding people to apply to UMC or Jinhua or both?</p> <p>A. Only for Jinhua.</p>
Jennifer Wang	7/9/2018	USD-0351361	32	<p>Q. Why was UMC helping Jinhua fill DRAM engineer jobs at the CASPA job fair?</p> <p>A. I came there because Stephen Chen's instruction.</p>
Jennifer Wang	7/9/2018	USD-0351361	35	<p>Q. To clarify, did you go to the UMC office in San Francisco to pick up the poster to bring it to the hotel in Santa Clara?</p> <p>A. Yes.</p> <p>Q. Had the poster been sent to San Francisco from Taiwan?</p> <p>A. No, it's from Jinhua.</p>
Jennifer Wang	7/9/2018	USD-0351361	35	<p>Q. Ah, I see. So how do you know that the poster in San Francisco that you picked up came from Jinhua?</p> <p>A. Sandy says.</p> <p>Q. Sandy Kuo informed you?</p> <p>A. Yes.</p> <p>Q. The poster that you transported from San Francisco to Santa Clara's was in relation to recruiting the attendees at the CASPA job fair to Jinhua?</p> <p>A. Yes.</p>
Jennifer Wang	7/9/2018	USD-0351361	39	<p>Q. When you, Ms. Wang, attended an interview of an applicant at the CASPA job fair, who else from UMC was in the room?</p> <p>A. The other four people.</p> <p>Q. The other four UMC representatives that you named in the deposition today who were Mr. Yu, Mr. Chen, Ms. Kuo and Mr. --</p> <p>A. Wu.</p> <p>Q. -- Wu?</p> <p>A. Yes.</p>
Jennifer Wang	7/9/2018	USD-0351361	42	<p>Q. Why did UMC want to attend CASPA in October 2016?</p> <p>A. (Through interpreter) So are you asking why we went?</p> <p>BY MR. KAY: Q. Yes.</p> <p>THE MAIN INTERPRETER: (Chinese spoken). A. I don't know. I just -- per Stephen Chen's instruction.</p>
Jennifer Wang	7/9/2018	USD-0351361	74	<p>Q. Did UMC and Jinhua have an agreement or a contract regarding recruiting for engineers to join Jinhua?</p> <p>A. I don't think so</p>
JT HO	7/12/2018	USD-0351661	11	<p>Q. Okay. Now, it's my understanding that you have been designated to testify on behalf of UMC as a corporate representative on certain topics. Is that your understanding?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	29	<p>Q. What were the findings of the forensics company regarding the question of whether UMC possesses Micron documents?</p> <p>A. The finding was that Wang Yong Ming sent some files to his personal company email. And also a couple of files were found in the trash bin of the PC that I use before I joined -- a few weeks before I joined UMC.</p> <p>THE CHECK INTERPRETER: Correction. "A few weeks after I joined UMC".</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
JT HO	7/12/2018	USD-0351661	30	<p>BY MR. MICHAEL:</p> <p>Q. Any other findings besides Mr. Wang sending files to his personal email and a couple files in the trash bin of a PC you used a few weeks after joining UMC?</p> <p>A. No.</p>
JT HO	7/12/2018	USD-0351661	30	<p>Q. What were the files in the trash bin of the PC you used at UMC?</p> <p>A. Process flow of 25 nanometer. Something like 110S live flow or live process. I really don't know how to describe it. It's a logistics preparation before technology transfer.</p> <p>THE CHECK INTERPRETER: Just one correction. Not "live flow". I think the witness said "process flow".</p> <p>BY MR. MICHAEL:</p> <p>Q. Was that a Micron document?</p> <p>A. (In English) Yes.</p> <p>Q. A Micron document that existed on your computer; correct?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	31	<p>Q. And it's for the 110S series of Micron's DRAM product?</p> <p>A. Yes.</p> <p>Q. And the document that involves the logistics of the process flow, do you know if that document is referred to as a traveler?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	37-38	<p>Q. Do you know if UMC today maintains a copy of any of Mr. Wang's laptops or hard drives from his laptops?</p> <p>A. The laptop is taken away by the prosecutor, so I don't think the company has a copy of it.</p>
JT HO	7/12/2018	USD-0351661	41	<p>THE CHECK INTERPRETER: "(Chinese spoken)".</p> <p>A. You mean from which date to which date?</p> <p>BY MR. MICHAEL:</p> <p>Q. Correct.</p> <p>A. I was on board with UMC in November 2015. I think I used the computer three weeks after the onboard, which is in November of 2015.</p> <p>THE CHECK INTERPRETER: Just one correction.</p> <p>"I think I used the computer three weeks -- during the three weeks after that."</p> <p>A. But not a computer; it was a hard drive. So the same computer, but different hard drives. I used the hard drive in the first three weeks after I got on board.</p>
JT HO	7/12/2018	USD-0351661	41	<p>BY MR. MICHAEL:</p> <p>Q. Let's do it this way, Mr. Ho. What is the date that you started at UMC?</p> <p>A. November 5th, 2015.</p> <p>Q. And when you started at UMC on November 5th, 2015, did UMC assign you a laptop computer?</p> <p>A. Yes, but I'm not sure if I got the laptop on that day or after a few days.</p>
JT HO	7/12/2018	USD-0351661	42	<p>Q. So approximately in the time period of November 5, 2015, you were assigned a UMC laptop; correct?</p> <p>A. Yes.</p> <p>Q. And that laptop has a hard drive; correct?</p> <p>A. Yes.</p> <p>Q. How long did you use that computer at UMC until a new hard drive was placed on the computer?</p> <p>A. About a few weeks. Roughly three weeks, I remember.</p>
JT HO	7/12/2018	USD-0351661	42-43	<p>Q. So are you comfortable if we refer to the first hard drive that was used with your UMC-issued laptop, the "November 2015 hard drive"?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	43	<p>Q. Sure. Were the Micron documents that were located in the trash bin of your hard drive found on the hard drive that you were using in November 2015?</p> <p>A. Yes.</p> <p>Q. Now, at some point after November 2015, you started using a different hard drive for your computer at UMC; is that correct?</p> <p>A. Yes.</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
JT HO	7/12/2018	USD-0351661	43	<p>Q. For how long at UMC did you use the second hard drive?</p> <p>A. Until February last year.</p> <p>Q. So from approximately 2015, December, to February 2017, you were using a second hard drive on your UMC-issued computer; correct?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	44	<p>Q. Does that second hard drive exist at UMC today?</p> <p>A. No.</p> <p>Q. Where is it?</p> <p>A. The prosecutor got it.</p>
JT HO	7/12/2018	USD-0351661	45	<p>Q. How many Micron documents existed on the second hard drive that you used from December 2015 to February 2017?</p> <p>A. Based on my understanding, none.</p> <p>Q. What's your understanding based on?</p> <p>A. For the first hard disk drive, I used the privilege to apply for the use authority of a USB. However, this turned out to be unfit for the company policy, so this USB access was canceled. So I did not have any other way, other than email. And I did not send any emails, so there was no way. I did not send any email regarding Micron documents, so there was no way. What I emailed back then was a self-introduction and some notes that I took, as well as some terminology or glossary of the semiconductor industry which I put together by myself.</p>
JT HO	7/12/2018	USD-0351661	51	<p>Q. The first hard drive that you had while at UMC had USB drive access enabled; correct?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	52	<p>Q. Why did UMC swap out your hard drive after being at UMC for only three weeks?</p> <p>A. Per my request.</p> <p>Q. Why did you make that request?</p> <p>A. It is UMC's policy to not have external document being read internally through a USB drive. So after the voluntary cancellation, we asked the IT department to clean up the hard disk drive, meaning that there would be no external information on the hard disk drive, or the possibility of a virus.</p>
JT HO	7/12/2018	USD-0351661	53-54	<p>Q. So it's your testimony that you made the request to swap out your first hard drive; correct?</p> <p>A. My request was to clean up the computer so that there are so bad things on the computer. It was later that I found out that the IT department actually swapped out the entire hard disk drive. It was until after the forensics company's investigation that I knew that the hard disk drive was swapped. I had always thought that it was the same hard disk drive.</p> <p>THE CHECK INTERPRETER: "As the second one."</p> <p>THE MAIN INTERPRETER: "As the second one."</p> <p>THE CHECK INTERPRETER: "And also the first hard drive was formatted."</p>
JT HO	7/12/2018	USD-0351661	54-55	<p>Q. Mr. Ho, were you using USB drives to access and review Micron documents on the first UMC-issued hard drive?</p> <p>A. I read all the information that I established when I was working for TSMC, (Chinese spoken), (Chinese spoken), and Micron. I read all of them.</p> <p>MR. JOHNSON: You read?</p> <p>A. The English name of "(Chinese spoken)" is Powerchip.</p> <p>THE CHECK INTERPRETER: And "(Chinese spoken)" is Rexchip.</p> <p>THE MAIN INTERPRETER: And the English name of "(Chinese spoken)" is Rexchip.</p>
JT HO	7/12/2018	USD-0351661	55	<p>BY MR. MICHAEL:</p> <p>Q. Mr. Ho, in the first three weeks that you were employed at UMC, were you using USB drives to access and review Micron documents on the first UMC-issued hard drive that you used?</p> <p>A. (Chinese spoken). THE CHECK INTERPRETER: Counsel, "USB drive" was translated as "USB hard drive". Is that what you meant?</p> <p>MR. MICHAEL: No.</p> <p>A. I only read the USB drive through the computer.</p> <p>BY MR. MICHAEL:</p> <p>Q. When you say "USB drive", you're talking about a flash drive; is that right, Mr. Ho?</p> <p>THE CHECK INTERPRETER: "(Chinese spoken)".</p> <p>A. I had two. Both are portable. One is this one, flash; the other is a USB hard drive</p>
JT HO	7/12/2018	USD-0351661	56-57	<p>Q. Have you searched any external drives in your possession for Micron documents?</p> <p>A. I don't quite know exactly what you're asking, because I had Micron documents. I did not have to search.</p>

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Name of Individual Making Statement	Date	Deposition Transcript Bates	Transcript Page #	QUOTE/STATEMENT
JT HO	7/12/2018	USD-0351661	57-58	<p>Q. Have you ever possessed any external drives that contain Micron documents since joining UMC in 2015?</p> <p>A. Yes.</p> <p>Q. Tell me about those external drives and what was contained on them.</p> <p>A. There's some personal information, for example the videos that I collected, or text filing information. And I have the habit to collect information and store information since I worked for TSMC. So I had information also at (Chinese spoken) --</p> <p>THE CHECK INTERPRETER: Powerchip --</p> <p>A. -- Powerchip, as well as Rexchip.</p> <p>THE CHECK INTERPRETER: -- and Micron.</p> <p>A. -- and Micron.</p>
JT HO	7/12/2018	USD-0351661	58	<p>Q. Let's break it down this way, Mr. Ho. During the time you've been employed at UMC, how many external drives did you possess that contain Micron documentation?</p> <p>A. Two.</p> <p>Q. And is one of those -- or is one of those two a flash drive?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	58	<p>Q. Is the second one also a flash drive?</p> <p>A. No. It's a hard disk drive.</p> <p>Q. And the first flash drive, do you know who the manufacturer of that flash drive was? Was it a Kingston flash drive?</p> <p>A. Yes, to my impression.</p> <p>Q. And the second drive, which you said is an external hard disk drive, who is the manufacturer of that drive, if you recall?</p> <p>A. (Chinese spoken).</p>
JT HO	7/12/2018	USD-0351661	59	<p>Q. Where is that flash drive today?</p> <p>A. At the prosecutor's.</p> <p>Q. What about the external hard disk drive? What was the size of that hard disk drive?</p> <p>A. I think 2T.</p> <p>Q. 2 terabytes?</p> <p>A. (In English) Yes.</p> <p>A. 2000G.</p>
JT HO	7/12/2018	USD-0351661	65	<p>Q. And where is that hard disk drive today?</p> <p>A. I handed it to the prosecutor last year.</p> <p>THE CHECK INTERPRETER: "Voluntarily".</p> <p>A. It was one week after I was on board with UMC that Stephen told me that UMC might have a DRAM project. But I think it was at the end of 2015 or the beginning of 2016 that there were official discussions about DRAM.</p> <p>Q. When did you start working on research and development for DRAM at UMC?</p> <p>A. About the same timeframe, starting from the end of 2015 to the beginning of 2016.</p>
JT HO	7/12/2018	USD-0351661	66	<p>Q. So you've been working continuously in DRAM at UMC since the end of 2015, early 2016, to today?</p> <p>A. Yes.</p> <p>Q. Who is the boss in charge of the DRAM project at UMC?</p> <p>A. You mean the highest one?</p> <p>Q. Yep.</p> <p>A. Based on my understanding, it's Stephen.</p> <p>Q. Stephen Chen?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	69	<p>Q. Did the Taiwan prosecutors confiscate any of your cell phones?</p> <p>A. Yes.</p> <p>Q. How many?</p> <p>A. One.</p>
JT HO	7/12/2018	USD-0351661	96	<p>Q. Where did you store all of the Micron documents that were in your possession while at Micron -- while at UMC?</p> <p>A. The USB flash drive that I mentioned earlier, and the hard disk drive of Transcend.</p> <p>Q. If you didn't put the Micron documents from your hard drive number 1 in the trash bin, who did?</p> <p>MR. JOHNSON: Objection. Calls for speculation and conjecture.</p> <p>A. Yes, of course it could have been me, because the computer was mine.</p>

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JT HO	7/12/2018	USD-0351661	97	<p>BY MR. MICHAEL:</p> <p>Q. Did you check to see if the computer had been issued to any other UMC employees?</p> <p>A. No. The computer was brand new. It was bought after I was on board.</p> <p>Q. And approximately – what was the approximate volume, number of Micron documents that you possessed on the flash drive?</p> <p>A. So I used the USB and then the company would detect the number of the USB used. So according to the statement of the IT department, there were 20,000 pieces of information.</p> <p>Q. When you say there were 20,000 pieces of information, do you mean that there were 20,000 files containing Micron information on your flash drive?</p> <p>A. Yes. According to the IT department, there were more than 20,000 files with Micron information.</p>
JT HO	7/12/2018	USD-0351661	98	<p>Q. And what about on your hard disk drive? What was the volume of Micron files on the hard disk drive? And so we're clear, Mr. Ho, I'm talking about the external drive.</p> <p>A. I thought we went through this question, and my answer earlier was more than 20,000 files. So is this asking the same question?</p> <p>Q. You identified two external drives, a flash drive as well as a hard disk drive; correct?</p> <p>A. Yes.</p> <p>Q. So my first question related to the flash drive. This latest question related to the external hard disk drive. Were there 20,000 files on both of them combined, or can you break them out for me?</p> <p>A. The information on the flash drive and the hard disk drive is the same. So one is just the back-up of the other. (Exhibit 38 marked for identification - Document entitled "Document Placeholder", partial printout of Excel file)</p>
JT HO	7/12/2018	USD-0351661	99	<p>Q. The reason we've only provided a partial document is if we were to print it out, it would be several thousand pages. Can you tell me if Exhibit 38 represents a document that identifies the 20,000-plus files of Micron information that were found on your external flash drive and hard disk drive?</p> <p>A. Partially. If you refer to the pages a few pages back, if you look at them, you would note that they are not Micron information. Those are Powerchip's information. If you refer to the first couple of pages, those were about Micron. But if you look at row 20,000-something, by just looking at them, you would note that they're not Micron's; they're Powerchip's. Because Rexchip has never run this product.</p>
JT HO	7/12/2018	USD-0351661	104	<p>Q. [REDACTED]</p> <p>A. [REDACTED]</p>
JT HO	7/12/2018	USD-0351661	110	<p>Q. But micron has a policy that its departing employees are not to take with them Micron confidential information when they leave Micron; correct?</p> <p>A. Yes.</p> <p>Q. And when you left Micron, you took Micron confidential information in violation of that policy; correct?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	111	<p>Q. [REDACTED]</p> <p>A. [REDACTED]</p> <p>Q. [REDACTED]</p> <p>A. [REDACTED]</p> <p>Q. While you were employed at UMC, did you review and access Micron information that you had on your external drives in locations outside UMC's facilities?</p> <p>A. Yes. On my personal external drive and hard disk drive</p>
JT HO	7/12/2018	USD-0351661	114	<p>MR. MICHAEL:</p> <p>Q. Are there former Samsung employees on UMC's DRAM team?</p> <p>A. There are two. Actually, there are three.</p>
JT HO	7/12/2018	USD-0351661	117	<p>Q. I'm sorry, I'm talking about the DRAM project that you have been working on at UMC since late 2015, early 2016.</p> <p>A. Okay. I'm currently still in this project.</p> <p>Q. Since December 2015 to today, have you been working exclusively on the DRAM project?</p> <p>A. Yes.</p>
JT HO	7/12/2018	USD-0351661	122	<p>The reason that there was such a large amount of information was because since 2009, I began to be involved in the technology transfer between Elpida and Rexchip. And also when there were important meetings with Elpida regarding information exchange, the company would send me to Japan to attend these meetings. So since 2009, 2010, all the way to the time when we became part of Micron, I made about 20 trips to Japan. So whenever there was a meeting in Japan about technology transfer, I would have this USB drive, and then the engineer in Japan would copy their draft to the USB drive. For regular technology transfer, it actually has to go through an official channel. The file that comes through that channel would come with a document series number. These official documents that come with a series number are encrypted and cannot be edited. So that would be very inconvenient for us engineers to work. So my role back then was there on behalf of Rexchip, so I would go there to ask for the technology transfer documents which were in draft version, covering the ranges of design, process integration and testing, basically all the information. So that explains why I had in possession such a large amount of information. So when I came back to the company, I would then copy the information to the public drive of the company. And naturally, my personal drive would have this information. So most parts of the files or information came this way.</p>

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JT HO	7/12/2018	USD-0351661	127	[REDACTED]
JT HO	7/12/2018	USD-0351661	128	<p>Q. [REDACTED]</p> <p>A. [REDACTED]</p> <p>Q. [REDACTED]</p> <p>A. [REDACTED]</p> <p>Q. [REDACTED]</p> <p>A. [REDACTED]</p>
JT HO	7/12/2018	USD-0351661	136-137	<p>(Exhibit 46 marked for identification - 32-page printout of Line text communications)</p> <p>BY MR. MICHAEL:</p> <p>Q. Mr. Ho, we've marked as Exhibit 46 a 32-page document which we understand to be a history of Line text communications between yourself and Mr. Kenny Wang. It has a "date stored" date on the top left side of the document which looks like February 13, 2017.</p> <p>A. Yes.</p> <p>Q. Mr. Ho, have you seen this document before?</p> <p>A. Yes, I saw this document in the court of Taiwan. The judge back then asked us to identify if there was any confidential information of Micron or any confidential information of UMC in the communication.</p>
JT HO	7/12/2018	USD-0351661	137	<p>Q. Does this document in fact represent a true and accurate history of your text conversation with Kenny Wang from December 25, 2015 through February 4, 2017?</p> <p>MR. JOHNSON: Objection. Lack of foundation. No evidence he prepared this document.</p> <p>A. So what is your question again?</p> <p>BY MR. MICHAEL:</p> <p>Q. My question is, does this document in fact reflect the actual text communications between you and Kenny Wang?</p> <p>A. If this is a direct printout, then the answer is "Yes".</p>
JT HO	7/12/2018	USD-0351661	139	<p>Q. Turning the page, Mr. Ho, to the text entry at 9:40. It's my understanding there's a reference in this text to "Big S". Do you see that?</p> <p>A. Yes.</p> <p>Q. Who is "Big S"?</p> <p>A. Stephen.</p> <p>Q. Stephen Chen?</p> <p>A. Yes. Do you want me to explain to you what this sentence means?</p>
JT HO	7/12/2018	USD-0351661	141	<p>Q. So February 7, 12:36, it looks like there's a reference in that text to "the boss"; is that right?</p> <p>Q. Again, Stephen Chen?</p> <p>A. Yes. S</p>
JT HO	7/12/2018	USD-0351661	142	<p>Q. And you were involved with recruiting Mr. Kenny Wang to join UMC?</p> <p>A. We are friends. And we were in frequent contact with each other. When we were at Micron, Micron asked us to sign a contract, one of which is about deleting the data when we leave Micron. Another one is that after we leave Micron, we are not allowed to actively recruit or help people at Micron to find another job. Because I signed this contract, so I was being careful.</p>
JT HO	7/12/2018	USD-0351661	147-148	<p>Q. Page 21, thank you. And the entries on June 30th start on page 21 and continue on to page 22. Starting at line time-stamped 9:43, Mr. Wang is asking you, "Where is Fu Che's computer? Can I borrow it to take a look at the file?" Correct?</p> <p>A. Yes.</p> <p>Q. And you responded that Stephen took Fu Che's computer; correct?</p> <p>A. Yes.</p> <p>Q. And then you respond again at 20:27, stating, "My one is in the gap above the small cabinet." Correct?</p> <p>A. Yes.</p> <p>Q. And again at 10:27, you state that the password for your computer is QWER1234; correct?</p> <p>A. Yes.</p>

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JT HO	7/12/2018	USD-0351661	147-148	<p>Q. Can I ask you to turn back to Exhibit 37, and let me know if anywhere in the indictment, and specifically the list of records that were confiscated by the Taiwan prosecutors, if either of the computers referenced on June 30th either Mr. Fu Che's computer or the computer that you were referring to with the password QWER1234 are identified in Exhibit 37.</p> <p>A. I guess this is the one, page 21, table 6, item number 1.</p> <p>Q. That is your computer with password QWER1234?</p> <p>A. I suppose so.</p> <p>Q. You suppose so, or it is?</p> <p>A. I think it is.</p>
JT HO	7/12/2018	USD-0351661	148-149	<p>Q. The dialogue also refers to Fu Che's computer. That's Fu Che Lee; correct?</p> <p>A. I think it's Fu Che Lee, Neil Lee.</p> <p>Q. Was Mr. Fu Che Lee's computer turned over to the Taiwan prosecutors?</p> <p>A. Based on my understanding, no.</p>
JT HO	7/12/2018	USD-0351661	150-151	<p>Q. Wasn't that in violation of UMC's policy prohibiting use of USB drives?</p> <p>A. That is correct. It is prohibited for a personal computer that gets to connect to the internet to use a USB drive. But in a lot of scenarios, a USB is a must. So, for example, when we are communicating with a customer at the design house, that usually involved a very large amount of data. Or sometimes when we take a picture on the camera and we need to send the photos on the company system, or sometimes when we communicate with a vendor regarding the devices or machines used, trying to figure out the process development or process-related issues, then we need a USB. Or sometimes when a vendor needs to talk to you about the capabilities of their machines, then they need to send you information. So the company cannot 100 percent prohibit the use of a USB drive. When there is a need to use a USB drive, you can apply. And then once you apply and your supervisor approves, then you get to have this privilege to use the USB.</p>
JT HO	7/12/2018	USD-0351661	151	<p>Q. Mr. Ho, did engineers at UMC use Mr. Lee's computer to access and review Micron documents that were stored on external drives?</p> <p>A. I don't know about the others, but I suppose Kenny did. Because the prosecutor found that Kenny also had Micron's information. And same for me. I also read the information.</p>
JT HO	7/12/2018	USD-0351661	152-153	<p>Q. Do you know if Mr. Fu Che Lee's computer that is referenced in this text exchange on June 30th, 2016, still exists at UMC today?</p> <p>A. I do not know.</p> <p>Q. Has anybody at UMC asked you to --</p> <p>A. I asked them, because back then the prosecutor came to get me and I was there being asked questions for two nights at the investigation bureau. Since my computer was confiscated, so I asked him, "What about your computer?" And then he told me it was gone, disappeared.</p> <p>Q. Mr. Lee's computer disappeared?</p> <p>A. That was not his computer, but it was the computer that he said it was disappeared. It was a public, shared computer..</p> <p>Q. Do you know if that computer was destroyed?</p> <p>A. I do not know.</p>
JT HO	7/12/2018	USD-0351661	153	<p>A. I guess they were also afraid to be caught, so I don't know. I don't know what they did to the computer.</p> <p>Q. Do you have any basis to believe that Mr. Rong, Rong Le Tien, was involved in hiding computers from the prosecutors?</p> <p>A. My understanding is that he probably didn't know the existence of this computer.</p>
JT HO	7/12/2018	USD-0351661	154	<p>Q. And to your knowledge, Mr. Ho, this computer that is referenced in the Line text exchange has never been turned over to the Taiwan prosecutors; correct?</p> <p>MR. JOHNSON: Objection. Calls for speculation. Only if you know.</p> <p>A. I do not know, and there supposedly was no way for the prosecutor to get this computer. Because the prosecutor has no knowledge about the existence of this computer.</p>
JT HO	7/12/2018	USD-0351661	155-156	<p>Q. Did you conduct an investigation to try to locate this missing computer?</p> <p>A. I talked to people who used this computer, and what Fu Che Lee told me was that one week before the prosecutor came to the company, this computer was borrowed by another person. (Chinese spoken).</p> <p>Q. I asked you if you conducted an investigation.</p> <p>A. (In English) Yes.</p> <p>A. And he has not used the computer for quite a while.</p> <p>A. (In English) Yes.</p> <p>Q. Okay. Did you locate the computer? Did you or anyone at UMC locate that computer?</p> <p>A. No.</p>